



United States
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Service



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Draft

Decision Notice

Walton Lake Restoration Project and Project-Specific Forest Plan Amendments

Lookout Mountain Ranger District, Ochoco National Forest
Crook and Wheeler Counties, Oregon
Township 13 South, Range 20 East, Section 21, Willamette Meridian

Predecisional Administrative Review Process:

This *draft* Decision Notice is made available with the July 2020 Revised Environmental Assessment for the Walton Lake Restoration Project pursuant to 36 CFR 218.7(b). The timeframe for the opportunity to object to this project will begin with publication of a legal notice in *The Bulletin* newspaper (Bend, Oregon). The Forest anticipates that the legal notice will be published on July 21, 2020. See page 18 for more information on the predecisional administrative review process.

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Decision Notice

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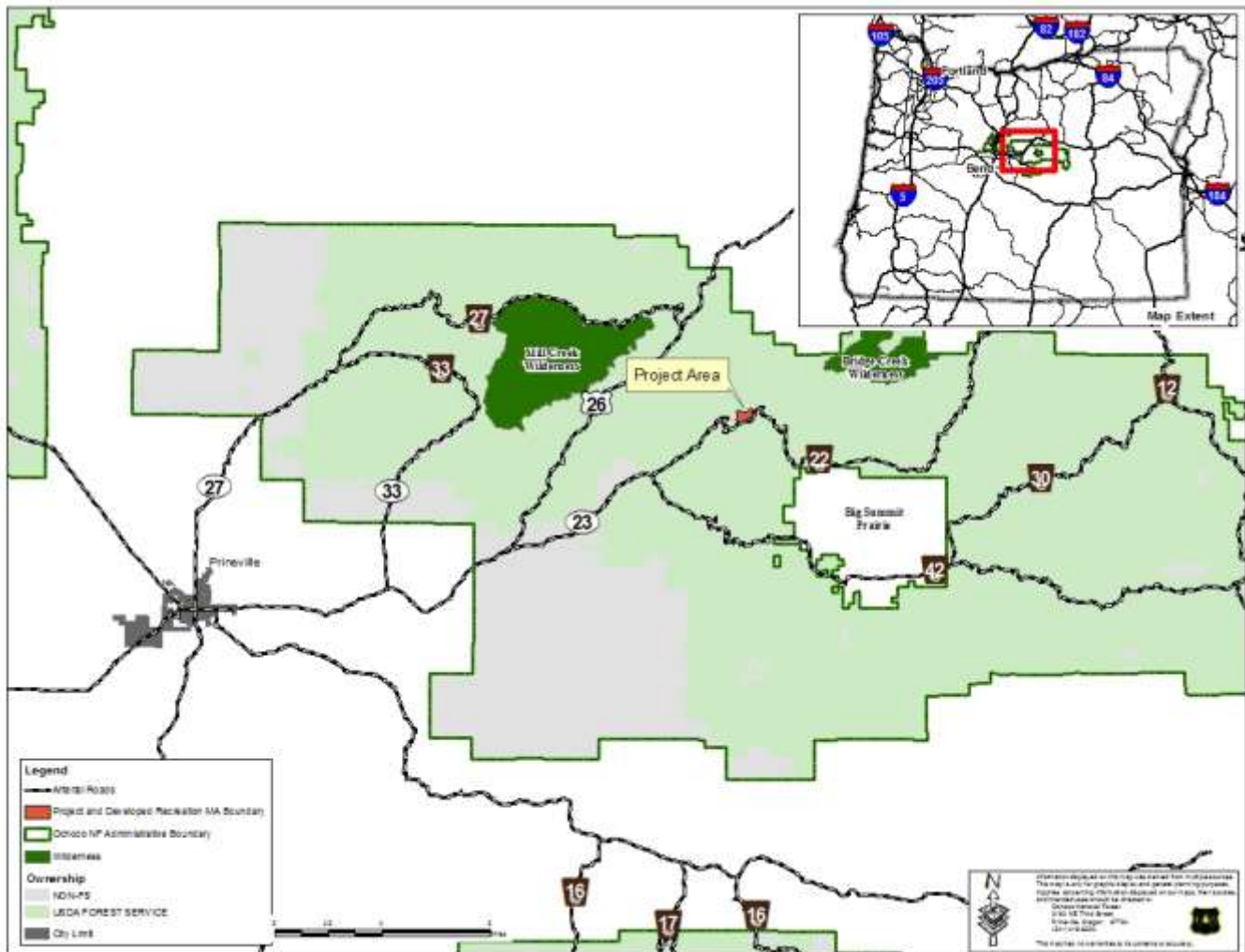


Figure 1: Vicinity of the project area within the Ochoco NF and in Oregon (inset)

DRAFT DECISION NOTICE

Walton Lake Restoration Project

USDA Forest Service
Lookout Mountain Ranger District, Ochoco National Forest
Crook and Wheeler Counties, Oregon

Introduction

This draft Decision Notice (DN) documents my decision and rationale for the selection of Alternative 2 of the July 2020 Walton Lake Restoration Project Revised Environmental Assessment (EA). Before a final decision is made, this DN is available for an objection process (see page 17 for details).

This project will address concerns related to public safety and forest health in a Developed Recreation Management Area located on the Lookout Mountain Ranger District, Ochoco National Forest. The project area is located northeast of the city of Prineville, Oregon, surrounding Walton Lake, a popular recreation destination. The project area lies entirely within Ochoco National Forest Land and Resource Plan (Forest Plan) Management Area MA-13, Developed Recreation. The project area totals 218 acres, which includes Walton Lake. See Figure 1, previous page.

Proposed Decision and Rationale

Specifics of the Decision

My decision authorizes 35 acres of sanitation harvest, 43 acres of commercial/non-commercial thinning, and 100 acres of noncommercial thinning, as well as planting of conifers, hardwood trees, and shrubs. Table 1 lists the treatment for each unit. Figure 2 displays the location of treatment units and temporary road locations. Resource Protection Measures and Best Management Practices included in this decision are listed in Appendix A and Appendix B.

Table 1: Summary of Activity by Unit

Unit	Acres	Activity
<i>Moist Mixed Conifer: Curb the laminated root rot infestation where it occurs within the Developed Recreation Management Area around Walton Lake to provide a healthy stand of resistant tree species and provide for public safety.</i>		
Unit 2	8	<ul style="list-style-type: none">○ Sanitation harvest: Remove all grand fir and Douglas-fir of all ages and all sizes○ Whole tree yarding and slash treatment as necessary.○ Restock the area with planted ponderosa pine, western larch, and a variety of hardwood species.
Unit 3	7	
Unit 4	20	
<i>Dry Mixed Conifer: Reduce stand density within overstocked dry mixed conifer stands to improve resilience of large ponderosa pine and western larch, and reduce risk of stand-replacing wildfire; enhance hardwoods.</i>		

Unit	Acres	Activity
Unit 1	25	<ul style="list-style-type: none">○ Commercial and non-commercial thin to recommended stocking levels, maintaining variable densities. Recommended stocking is variable based on site quality.○ Hand pile slash and burn piles○ Plant and protect native hardwood trees, shrubs and forbs
Unit 5	18	
Unit 6	55	<ul style="list-style-type: none">○ Noncommercial thin to reduce number of small non-merchantable trees (generally < 9" DBH but up to 12" DBH where encroaching into hardwood communities)○ Hand pile slash and burn piles○ Plant and protect native hardwood tree, shrubs, forbs, grasses and sedges
Unit 7	38	
Unit 8	7	
Connected Actions		
Temp Road	0.41 miles temporary road construction for unit access	

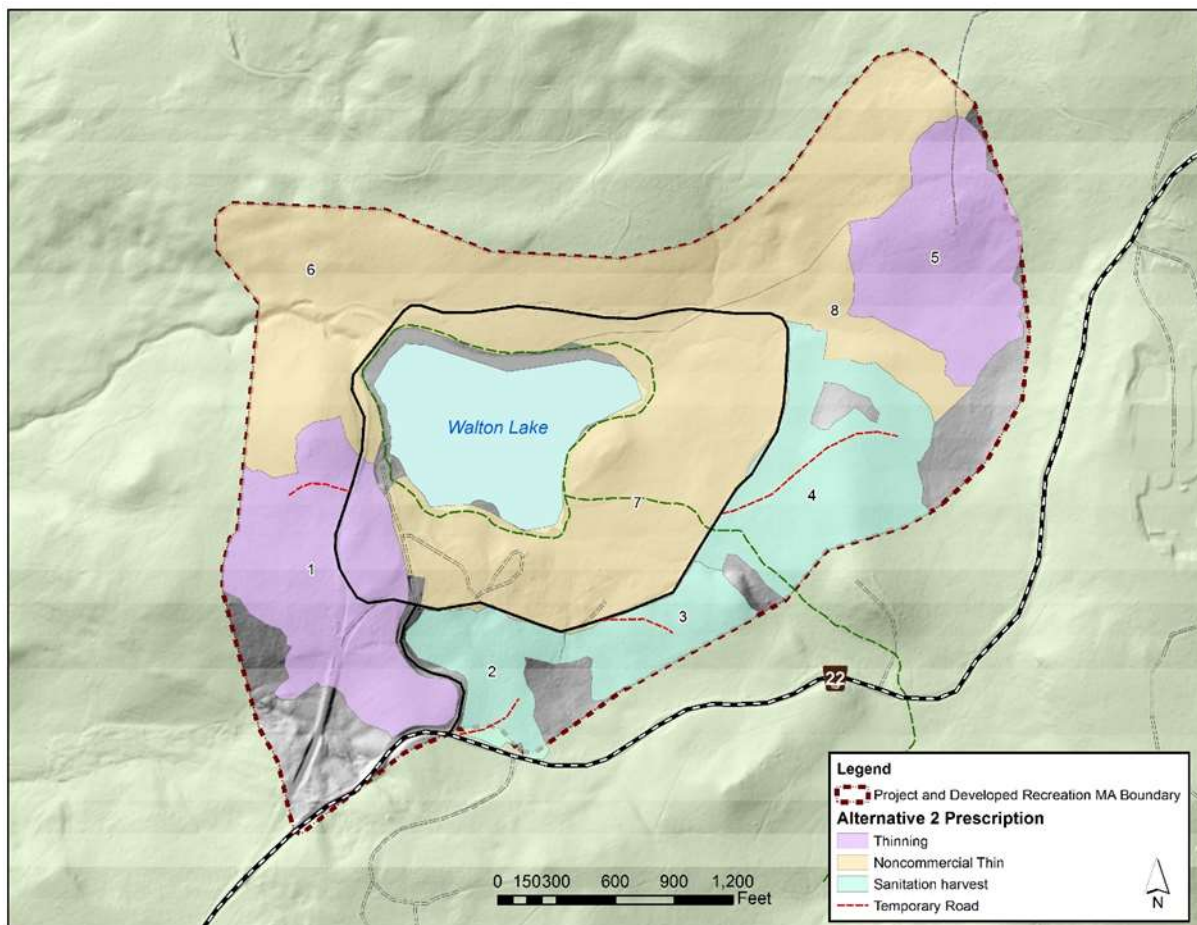


Figure 2: Alternative 2 Treatment Units

Description of Project Activities

Commercial Thinning in Units 1 and 5

Commercial thinning treatments in Units 1 and 5 are designed to meet stand-specific conditions including density, species composition, and stand structure. Following the commercial thinning, noncommercial thinning is prescribed. The major emphases of the silvicultural treatments in units 1 and 5 are:

- Maintain existing old growth ponderosa pine trees by reducing stand densities and reducing susceptibility to bark beetles and crown fires.
- Maintain a variety of tree species and size classes of trees to maintain the visual diversity of the recreation area.
- Incorporate variable thinning densities that also add to the visual diversity of the recreation area.
- Promote the development of younger and smaller sized ponderosa pine and western larch trees to provide for future trees that will become the large and old trees that are desired visually.

Units 1 and 5 will be thinned, on average, to recommended stocking levels while retaining variable densities. Young (less than 150 years old) grand fir and Douglas-fir trees ≥ 21 inch diameter at breast height (DBH) may be removed where they are growing within 30 feet (the approximate equivalent of two driplines) of old growth ponderosa pine trees (Van Pelt, 2008). This treatment is designed to restore historic species compositions as well as increase the resiliency of existing old trees. It will be applied to old ponderosa pines that are under competitive stress from large grand fir and/or Douglas-fir which, although large, do not qualify as old trees. Grand fir and Douglas-fir that qualify as old trees will not be removed. Removal of large young trees from the vicinity of old trees for approximately twice the canopy drip line of the old tree is consistent with the guidelines provided in Restoration of Dry Forests in Eastern Oregon (Franklin et al., 2013). The proposed variable density thinning is intended to generally follow the guidelines provided in Restoration of Dry Forests in Eastern Oregon (Franklin et al., 2013). These units are unique, however, as the forest health emphasis of preventing insect and disease outbreak in a Developed Recreation Management Area is to provide a safe environment for the public as well as for aesthetics. Treatments must also consider the protection of recreation infrastructure.

These treatments can create immediate stand structure and species composition shifts to a single-strata stand with early seral species composition because the treated stands will no longer be dominated by a dense understory and trees that are removed tend to be mid and late seral species. Overall, species diversity will be retained after harvest, but the proportion of early seral/fire tolerant species will increase. Units 1 and 5 will retain some irregular spacing and uneven-aged structure and age distribution. Remaining large trees will become more vigorous following the harvest since between-tree competition will be reduced. Post-harvest residual basal area per acre will be approximately 50 to 70 square feet. Residual basal area per acre could exceed 100 square feet if numerous old growth trees are already present.

Recommended stocking levels vary depending on site quality, tree size and species. For example, the desired density range for an uneven-aged ponderosa pine stand on a grand fir-pinegrass site is

89 to 133 trees per acre when the average diameter is 10 inches DBH and the corresponding basal area will be between 49 and 73 square feet per acre. If the average diameter is larger, then fewer trees will be retained but the residual basal area will increase. Fewer trees will be retained on drier sites relative to moister sites. Recommended stocking levels are derived from “Suggested Stocking Levels for Forest Stands in Northeastern Oregon and Southeastern Washington: An Implementation Guide for the Umatilla National Forest” (Powell, 1999).

The prescriptions in Units 1 and 5 will also require that live trees with old tree characteristics be retained, regardless of size or condition unless they pose a safety hazard. Identification of old trees is based on tree characteristics discussed in Identifying Old Trees and Forests in Eastern Washington (Van Pelt, 2008). These include bark characteristics, branching structure, and crown form.

Following commercial harvest in Units 1 and 5, the stand will be non-commercially thinned and the slash handpiled.

Commercial Sanitation Harvest in Units 2, 3 and 4

Commercial sanitation treatments in Units 2, 3 and 4 are designed to remove trees that are infected with root disease or susceptible hosts of root disease that are causing and/or will cause future safety concerns in the project area (see Forest Health Biological Evaluation). Following the harvest and fuels clean-up, the units will be planted with ponderosa pine and western larch seedlings. The major emphases of the silvicultural treatments in Units 2, 3 and 4 are:

- Remove all grand fir and Douglas-fir trees (live and dead) greater than 8 inch DBH with commercial harvest, because these species are highly susceptible to laminated root rot. The majority of trees within these units are grand fir or Douglas-fir.
- Maintain existing old growth ponderosa pine trees by reducing stand densities and reducing susceptibility to bark beetles and crown fires.
- Maintain all ponderosa pine since they are not typically a host of laminated root disease. These trees will be the foundation of the future stands in these units and will add to the visual diversity of the recreation area.
- Maintain all western larch since they are not highly susceptible to laminated root disease on the Ochoco National Forest. These trees will also be part of the future stands in these units and will add to the visual diversity of the recreation area.
- Plant ponderosa pine and western larch seedlings, at about 300 per acre sourced from local seed zones.

The intent is to promote the development of ponderosa pine and western larch trees to provide for future trees that will become the large and old trees that are desired visually and not at high risk of becoming safety hazards. Variable spacing will be used when planting seedlings to aid in emulating a naturally-regenerated stand condition. Small grand fir and Douglas-fir may be temporarily retained following logging for three to five years while the pine and larch seedlings are getting established. These small grand fir and Douglas-fir trees will then be cut by hand once the seedlings are established and then hand piled and burned. Small leave areas are incorporated into the unit boundaries for the protection of riparian areas. These leave areas are away from the road and trail and will protect sensitive ground.

Harvest activities under Alternative 2 would require the use of 0.41 miles of temporary road. These are built to facilitate ground-based harvest systems, built to low specification to minimize ground disturbance. These would be restored after use and seeded with native grasses.

Noncommercial Thinning in Units 1, 5, 6, 7 and 8

The objective of this treatment is to reduce the amount of small non-merchantable trees (generally less than 9 inches DBH). Trees meeting old tree criteria will not be felled during these operations. The number of small trees to be left varies by stand conditions, depending on the overall stocking objectives and the amount of existing over story. In areas of the units where the objective is to have an open park-like setting, highlighting the old growth ponderosa pine, few small understory trees will be retained. Where few over story trees exist, the non-commercial thinning will retain many more small trees per acre, up to a stocking level of 100 trees to the acre. Ponderosa pine and western larch are the preferred leave trees, followed by Douglas-fir and grand fir. For visual reasons a variety of species will be retained. Trees with disease will be removed. Non-commercial thinning will follow the commercial harvest in units 1 and 5, and will be the only treatment in units 6, 7 and 8.

The noncommercial thinning treatment near and in recreation sites will be designed to remove smaller trees within the dripline of large and old ponderosa pine trees, which are also functioning as ladder fuels to the crowns of the overstory pines. In these areas the noncommercial thinning treatment will be designed to account for campsite screening, aesthetics, and recruitment of large pines for the future.

Noncommercial thinning will also be designed to enhance hardwood species such as aspen, willow and alder. This involves reducing conifer competition by cutting down conifers that have encroached into hardwood communities and are shading out the hardwoods as well as occupying growing space. In these areas where conifer removal will benefit existing hardwoods, conifers up to 12 inch DBH may be felled so long as they do not qualify as old trees.

Hardwood Tree, Shrub and Forb Planting and Protection

A variety of native species will be planted to benefit wildlife and pollinator habitat, as well as increase the diversity of species that will add to the visual diversity and campsite screening. Hardwood trees that could be planted in riparian areas include quaking aspen, thinleaf alder, black cottonwood and a variety of Ochoco willow species. Both upland and riparian shrubs are planned to be planted. The list of potential shrubs species includes serviceberry, chokecherry, blue elderberry, mountain-ash, redosier dogwood, mockorange, black hawthorne, rose spirea, golden currant, sticky currant, swamp gooseberry and wild rose. Native forbs and grasses that could be planted include western columbine, coneflower, largeleaf avens, blue wild rye, pinegrass, and prairie junegrass. Planting will occur once the mechanical treatments are completed. To prevent browsing on planted and naturally established hardwood seedlings and saplings, some form of protection could be installed such as fencing or individual cages.

Fuels Treatments

Slash piling is typically done immediately following thinning with the piles being burned one to two years after the piles are constructed. There are a variety of piles that will be made with this project: handpiles, grapple piles and landing piles.

- Handpiles are constructed of slash (limbs, boughs and small tree boles up to 6 inches in diameter) and are typically four to eight feet wide, four to eight feet high and four to eight feet long. Handpiles are manually constructed. Handpiling is planned for treating the precommercial thinning slash in units 6, 7, 8 and post-harvest slash in Units 1 and 5. Post-harvest handpiling may occur immediately adjacent to the campground road in Units 2, 3 and 4.
 - Precommercial thinning slash will be left on the ground within the RHCAs to retain wood concentrations in these areas except in Camp Creek where precommercial thinning slash will be left within 25 feet of Camp Creek and the remaining trees will be piled to reduce fuel loading in the area.
- Grapple piles consist of slash typically up to 12 inch diameter that is stacked by an excavator with a grapple on an articulating arm; they are 5 to 10 feet high by 10 to 15 feet in diameter. The equipment operates on existing logging skid trails and on slopes less than 35%. A typical grapple piled unit has twelve piles per acre which are approximately 150 square feet per pile. Grapple piling is planned as an optional treatment in units 2, 3 and 4, depending on the amount of slash left after whole tree yarding.
- Landing piles are a product of commercial harvest and consist of tops, limbs and unmerchantable parts of trees. Landing piles are only planned for two sites that are located the furthest away from the camping area in unit 5 and part of unit 4. On average a landing pile covers 3,000 square feet of a ten acre unit when the area is whole tree yarded. Piles are burned after drying for one to two years.
 - Landing Slash Removal: Unique to this project because it is located in a campground, landing slash will be removed and hauled off-site in Units 1, 2, 3 and part of unit 4. This will be a service item that the contractor will be required to perform off site removal.
 - Harvest-generated slash would be managed as follows:
 - As much slash as possible would be brought to the landings via whole-tree yarding, which would be used as much as possible; alternatively the last log will have the top attached.
 - Landing slash would be removed to reduce visual impact and fuel loading, except in the two landings that are farthest from the campsites (landing slash may be removed from these two landings, but removal would not be required). The slash would be relocated to a pit where it would be burned.
 - Following harvest the amount of slash left in Units 2, 3 and 4 would be reviewed; due to the advanced disease and root rot present in these units, it is expected that additional slash piling (machine or hand piling, or a combination of the two) would be necessary. These piles would be burned within 2 years following harvest.

Forest Plan Amendments

Eastside Screens Amendments

Approximately 19 acres of the Walton Lake Developed Recreation Management Area are within the boundary of the Special Use Permit that authorizes operation of the campground and day use area by a concessionaire. This coincides with the “developed site” portion of the Developed Recreation Management Area (see EA Figure 5). The acres under permit are exempted from the management direction of the Eastside Screens¹. This is reflected in the acres subject to the Eastside Screens amendments discussed in the following paragraphs.

Amendment #1: Net Loss of Late and Old Structure

Alternative 2 would require an amendment to Eastside Screens, Standard 6 (d) Scenario A: “If either one or both of the late and old structural (LOS) stages falls BELOW HRV in a particular biophysical environment within a watershed, then there should be NO NET LOSS OF LOS from that biophysical environment. DO NOT allow timber sale harvest activities to occur within LOS stages that are BELOW HRV.” The harvest would be within LOS stages that are above HRV. The amendment would waive this standard and allow for 28 acres of net loss of LOS.

This amendment would apply to about 28 acres that are outside the area under special use permit. This amendment is needed to allow removal of all trees that are highly susceptible to laminated root rot (grand fir and Douglas-fir) within the stands where that pathogen occurs in the project area. This amendment is needed in order to meet the purpose and need of the project, which is to address concerns for public health and safety associated with pathogen-weakened trees within the Developed Recreation Area around Walton Lake.

Amendment #2: Harvest of Trees ≥ 21 ”

Alternative 2 would require an amendment to Eastside Screens Standard #6(d) Scenario A (2)(a): “Maintain all remnant late and old seral and/or structural live trees ≥ 21 inches DBH that currently exist within stands proposed for harvest activities.” The amendment would waive this standard on a total of 68 acres in the project area.

The amendment is needed to allow removal of trees ≥ 21 inches DBH on 28 acres of moist mixed conifer stands (Units 2, 3, and 4). The diffuse, patchy nature of the laminated root rot infestation within the moist mixed conifer stands in the Developed Recreation Management Area makes buffering the affected area ineffective at meeting management objectives. Forest health experts recommend that sanitation harvest and planting with more resistant species is a more effective approach, because this technique should halt the steady creation of hazard trees over time and the maintenance associated with it. Removal of all highly susceptible host species within treatment units would require harvest of trees ≥ 21 inches DBH.

This amendment would also apply to 40 acres of dry mixed conifer stands (Units 1 and 5) to increase health and resiliency of old, large diameter ponderosa pine and western larch in the units. Young (less than 150 years old), relatively large (greater than 21 inches DBH) grand fir and Douglas-fir trees are competing with older ponderosa pine and western larch, causing competition stress and increasing the risk the older trees may die as a result of insects, drought,

¹ See Decision Notice, Regional Forester’s Amendment #2, 1995, page 1: “The following types of sales will not be subject to the interim standards:...sales to modify vegetation within recreation special use areas....”

or wildfire. By reducing tree densities, the older trees would have greater access to water, nutrients, and sunlight resulting in not only their continued existence, but allowing for increased growth, health, and vigor (McDowell et al., 2003). The amendment to remove trees ≥ 21 inches DBH is consistent with restoration strategies by Dr. Norman Johnson and Dr. Jerry Franklin (Franklin and Johnson, 2009).

Ochoco LRMP Amendments

Amendment #3: Change in Visual Quality Objective

The current visual quality objective for the Developed Recreation Management Area (MA-F13) and Forest Road 22 Visual Corridor (MA-F26) is “retention,” which means that human activities should not be evident to the casual forest visitor. (LRMP 4-192 and glossary). The LRMP also states that timber activities will normally not be visually evident, but may be used for safety and visual enhancement (LRMP 4-71). As explained the Scenic Quality section of Chapter 3 Scenery Management Systems have replaced the Visual Management System (VMS) methodology for assessing effects to the scenic integrity levels, the Forest Plan references VMS; therefore the amendments are focused on the standard in the Forest Plan.

The amendment would change the visual quality objective in the units treated for laminated root rot to the Modification standard for approximately ten years. Project design would be incorporated to minimize negative visual effects from project activities. The LRMP anticipated that forest health issues would need to be addressed to provide for public safety related to diseased trees (as evidenced by standards and guides for addressing forest health through harvest practices); however, it did not anticipate specifically that within a Developed Recreation Management Area the spread of a root disease would require a full stand treatment across about 35 acres that would make meeting the visual quality standard of Retention nearly impossible to meet.

Amendment #4: Waiver of Patch Size Standard

Standards and guides related to harvest practices within Developed Recreation Management Area (MA-13) limit patch size to no more than five acres (EA p. 5). The amendment would make the Walton Lake project exempt from the patch size standard. The LRMP anticipated that forest health issues would need to be addressed to provide for public safety related to diseased trees or for aesthetic purposes and it allows for even-aged management in a visual influence area up to 5 acres (EA p. 6). The Forest Plan did not, however, anticipate the spread of a root disease might require a sanitation treatment that removes trees of all size classes over more than 5 acres.

Reasons for the Decision

Because of the management emphasis of the area, I am selecting Alternative 2. It provides the best opportunity for long-term public enjoyment of this area, with fewer risks of falling trees, and more longevity in large ponderosa pine trees.

Response of Alternative 2 to the Purpose and Need

Overall, Alternative 2 best meets the Purpose and Need for Action. Alternative 2 will improve the resiliency of legacy trees and the overall health of forested stands by commercially thinning about 43 acres and non-commercially thinning about 100 acres of dry mixed conifer stands.

Reducing stand density will improve the health and resiliency of residual trees including legacy ponderosa pine and other large-diameter trees. Tree mortality occurs in the dry mixed conifer stands and the Forest regularly assesses and removes hazard trees; I don't want to see mortality escalate and particularly not in the largest trees which could occur if bark beetles take hold. Science shows that thinning is effective in reducing bark beetle susceptibility. Additionally, promoting large ponderosa pine is consistent with Forest Plan direction to encourage large trees and open park-like stands in the visual influence area. Thinning also reduces ladder fuels, which in the event of a fire, create a ladder for flames to climb from the surface up into the canopy of large trees.

Alternative 2 will control the presence and spread of laminated root disease within the project area by removing highly susceptible host species (grand fir and Douglas-fir) of all ages and sizes from about 35 acres of moist mixed conifer stands and replanting the treated acres with species that are much less susceptible (ponderosa pine and western larch) or immune (hardwoods) to laminated root disease. The EA summarizes the existing situation in the mixed conifer stands southeast of the loop around the Walton Lake developed site that are infested with laminated root rot (EA pp. 1-3, 36-37). More information is available in the Forest Health BE. Without treatment, the host trees will continue to succumb and fall, the stand would become more open with fewer and more widely scattered large trees. This has required a closure of that part of the recreation area because the trees can fall without warning and pose a serious safety issue. The mortality is accelerating, creating even more hazard trees each year that need to be felled before opening the site. This also exposes Forest Service personnel to additional risk by having to assess and fall the hazards year after year. A full stand treatment including reforestation will address the issue in one entry, and will begin the development of a healthy stand of vegetation that can provide for public enjoyment well into the future.

Response of Alternative 2 to the Key Issues

Effects to Late and Old Structure (LOS) and Large Tree Abundance

I reviewed the effects analysis related to the abundance of large trees and late and old structure (LOS). Our interdisciplinary team developed two alternatives to the proposed action in order to analyze and compare the effects of removing trees ≥ 21 " DBH and conducting sanitation harvest within Units 2, 3, and 4 which are considered LOS. EA pp. 10-11, 44-49.

The public concern was with the 35 acres of moist grand fir LOS (Units 2, 3, and 4) that would be removed with sanitation harvest. An analysis of the Historic Range of Variability (HRV) found that the existing level of multi-strata LOS in the watershed is above HRV for both moist and dry grand fir. The EA p. 46 points out that sanitation harvest under Alternative 2 would affect about 3% of the multi-strata LOS in the watershed and the remaining level of LOS would continue to be above HRV. I find this an acceptable and non-significant effect, particularly considering that the outcome under No Action would be continued mortality in host species and decline of large tree structure. EA pp. 38, 45, 47.

Large tree abundance was analyzed to determine the effects of harvest of large trees in Units 1, 2, 3, 4, and 5. Public comments expressed concern that the project would have a cumulative effect on large trees at the Forest scale. In thinning Units 1 and 5 fir trees ≥ 21 " DBH would be removed when within 30 feet of old growth ponderosa pine. The goal of thinning in units 1 and 5, including the removal of large young fir trees in proximity to large old ponderosa pine is to reduce competition stress and reduce risk of bark beetle attack. This would amount to the

removal of about 50 large fir trees. In these units old trees, regardless of size would still be retained even in proximity to old growth ponderosa pine. In Units 2, 3, and 4 sanitation harvest would remove all host species and this amounts to about 521 large fir trees to be removed. Within these units large ponderosa pine and western larch would be retained and become more visible. Looking at the large tree abundance at the Forest scale, which was raised as a concern, this project is small enough that it effects only 0.02 – 0.04 percent of large trees. The persistence of large old growth ponderosa pine within the project area is an important objective and I am selecting the alternative that provides the best opportunity for them to survive into the future.

Effects to Scenery and Visual Quality

One of the questions to be addressed with this decision is whether the short-term visual impacts are an acceptable tradeoff for meeting long-term objectives of the recreation area. There is disagreement about how severe the changes may appear. I acknowledge that scenic quality is an inherently subjective topic. A person's values and attitudes can determine how they react to changes in the forest. EA p. 65. I heard from members of the public who admitted to never having visited Walton Lake, but were sure they never would visit if the Forest Service were to undertake vegetation management as proposed in the EA. I also heard from people who live in the area and visit Walton Lake frequently – many expressed positive feelings about addressing the forest health issues and improving public safety.

In reviewing the expected effects of Alternative 2, I find that though the sanitation harvest in Units 2, 3, and 4 may have the most visual impact, these units are screened or partially screened from the lakeshore and from campsites due to vegetation and topography. EA p. 71. Additionally I find that the project design is well thought out to minimize the visual impacts of the activities. EA pp. 26-27. The Forest Service has considerable experience in conducting vegetation management activities around developed recreation sites including thinning, planting, and treating areas with large numbers of hazard trees. I am confident that with careful implementation of tree removal, restoration of skid trails, and judicious planting of ponderosa pine, western larch, and a variety of hardwood species, the activities in this portion of the project area will not be evident to the casual forest visitor within about 10 years. I believe short-term visual impacts are an acceptable trade-off and are necessary for the long-term health of the forested areas around Walton Lake and the safety of the public.

Consideration of other Public Comment

Throughout the planning of this project, District Ranger Turner and I have been involved in efforts to ensure those who will be affected by the changes to the forested vegetation around Walton Lake have been informed about the project. The Forest Service has accepted comments several times and I have considered all of that input in making this decision. Though there has been support for this project, including from the local board of County Commissioners, there has also been strong opposition by some members of the public. Comments submitted on the draft revised EA were reviewed and used to provide clarification of some information and analysis in the EA. Our team has also provided written responses to the comments which are included in this DN as Appendix C.

I received comments expressing concern that we are not considering the naturalness of forest pathogens such as laminated root rot in the forest and the beneficial aspects of them. In reviewing the analysis in the EA, I find that although the benefits are acknowledged, the risk of allowing those natural forest pathogens to remain unchecked in this recreation area far outweighs

the benefits. This project area is too small to provide any significant value to what is already occurring outside the project area, and science relating to laminated root rot is very clear: it is the most hazardous root disease to people and property in recreation sites, and that is why we must take the actions outlined in this decision. I also select Alternative 2 to follow Forest Plan direction to utilize all methods in preventing or suppressing insect and disease outbreak in a Developed Recreation Management Area, both within the developed site and the visual influence area.

Some commenters do not believe that the project will meet the intended purpose and that the proposed sanitation harvest may be counterproductive and spread laminated root rot. Our specialists have reviewed the scientific literature submitted in support of this comment. The body of research shows that removing highly susceptible host tree species and replanting the site with immune, resistant, or tolerant tree species is a common strategy to reduce the adverse effects associated with this root rot which causes structural instability in trees. See Appendix C, Comments #26 - 30.

I also received comments expressing concern over wildlife habitat and whether the Walton Lake project area would become devoid of wildlife after forest health treatments. In making my decision I considered whether or not the project area provides important wildlife habitat, and the potential effects to wildlife habitat. This project area is highly developed and is dedicated to use by people. Of course the area does provide habitat for some species and the public does enjoy seeing wildlife around the area and on the lake, but the area has some form of human presence and associated disturbance throughout most of the year in one form or another and use of the area by wildlife is affected by the presence of humans. EA p. 79. The EA points out, for example, that habitat for bufflehead is present and the species has been observed, but nesting may be limited due to high levels of human use. EA p. 87.

I've reviewed the potential for effects to wildlife and find them to be negligible. There is no critical habitat for listed species in or near the project area. For many species, the project area is too small to register negative impacts on landscape-level habitat requirements. Additionally, the project incorporates project design features that protect old trees regardless of size in the thinning units, protect sensitive riparian areas, and limit wildlife disturbance from implementation activities (EA pp. 24 - 28). Promoting hardwood trees and shrubs in the project area will improve habitat for some species, as will the promotion of more open forest conditions favoring a mix of ponderosa pine and larch in the overstory.

Additionally, Alternative 2 is consistent with the Forest Plan direction for wildlife habitat in the Developed Recreation Management Area. Although the tree mortality associated with bark beetle activity and laminated root rot can provide habitat for primary cavity excavators and other species, Alternative 2 as described in the EA is consistent with the Forest Plan which calls for maintaining snags at the 0% level (EA p. 105).

Other Alternatives Analyzed

Alternative 1

The No Action alternative is described on page 13 of the EA. No thinning or sanitation harvest would occur and there would be no planting of hardwood species. The closure of the area infested with laminated root rot would continue. I did not select this alternative because it would do nothing to meet the purpose and need. The direction in the Forest Plan to use all methods to

prevent or suppress insect and disease outbreaks would not be followed. Large ponderosa pine would remain at risk to bark beetle mortality and the ongoing mortality from laminated root rot and other diseases would continue to create hazards to the recreating public.

Alternative 3

Alternative 3 was developed to address the key issues and is described in the EA on page 16. This alternative would improve the stand conditions within Units 1, 5, 6, 7, and 8 by thinning small fir trees and thinning larger fir trees where they are within close proximity to large old ponderosa pine. Within Units 2, 3, and 4 the sanitation harvest would be limited to within 150 feet of the entrance road and campground loop road. This would create a more safe buffer along the road, though the falling tree hazard signs would still remain to warn people not to enter the stand. Only 14 acres of moist mixed conifer multi-storied LOS would be affected. Alternative 3 partially meets the purpose and need by reducing stand density in the thinning units and controlling the laminated root rot infestation along the loop road. This alternative was not selected, however, because I believe the appropriate course of action is to tackle the whole area infested with laminated root rot within the Developed Recreation Management Area and develop a new healthy stand, rather than just partially treat it.

Alternative 4

Alternative 4 was also developed to address the key issues and reduces the treatments even further in order to eliminate any Forest Plan amendments. Alternative four partially meets the purpose and need by conducting thinning in Units 1, 5, 6, 7, and 8 to reduce stand density. This alternative was not selected because there is no remediation of the forest health issues in Units 2, 3, and 4 that create a public safety issue and because this alternative would leave large ponderosa pine more vulnerable to density stress because large fir near them would not be thinned out.

Other Alternatives Considered

Six other options were considered but not analyzed in detail. These options and the reasons they were not analyzed in detail or adopted in the selected alternative is also explained in the EA pages 32-33.

Public Involvement Conducted

Scoping of the proposed action initially occurred in 2015. Project information was published online on the Ochoco National Forest web site at the following link:

www.fs.usda.gov/project/?project=47019.

The Ochoco National Forest initiated consultation on the Walton Lake Restoration Project with the Klamath Tribes, the Confederated Tribes of the Warm Springs Reservation, and the Burns Paiute Tribe via a letter mailed on June 4, 2015. No Tribal representatives responded. On June 4, 2015, a letter announcing the Walton Lake Restoration project and requesting comments was sent to approximately 200 interested citizens, organizations, and county, state, and federal agencies. Three individuals joined the Forest Service on August 11, 2015 for a field trip to the project area to discuss the management options related to laminated root rot and density-dependent forest health issues.

A preliminary EA was circulated to the public in March of 2017 for concurrent scoping and comment periods; the opportunity to comment was announced in a legal notice that was published in the newspaper of record (*The Bulletin* in Bend, Oregon) on March 17, 2017. The

Ochoco National Forest mailing list participants via email and/or US Mail were notified of the opportunity to comment. This resulted in 20 response letters.

A June 2019 public information meeting was held in Prineville, Oregon jointly with the Ochoco Forest Restoration Collaborative. Attendees submitted four written comments. The Forest Service began the NEPA process again in 2019 with a scoping letter dated August 7, 2019. This resulted in an additional 18 letters from the public. The Forest Service staff attended a public event hosted by the Ochoco Forest Restoration Collaborative on October 15, 2019 in Prineville and shared information with the attendees on how the public comments were used to develop alternatives. This information was also posted to the Forest Service web site.

Consultation with Government Agencies and Tribes

Tribal Governments

The Ochoco National Forest initiated consultation on the Walton Lake Restoration Project with the Klamath Tribes, the Confederated Tribes of the Warm Springs Reservation, and the Burns Paiute Tribe via a letter mailed on June 4, 2015. No Tribal representatives responded.

USFWS

Informal consultation on effects to the endangered gray wolf has been completed by complying with project design criteria for Federal land management activities outlined in the 2020-2030 Programmatic Biological Assessment with the U.S. Fish and Wildlife Service. The project may affect, but is not likely to adversely affect gray wolf.

SHPO

The Forest has completed necessary reporting for the State Historic Preservation Office (SHPO) following guidelines in the Regional Programmatic Agreement among USDA-Forest Service, the Advisory Council on Historic Preservation, and the Oregon SHPO. Consultation will be completed prior to a final Decision Notice.

Legal Requirements and Policy

In reviewing the EA and actions associated with Alternative 2, I have concluded that our decision is consistent with the following laws and requirements:

The National Environmental Policy Act (NEPA)

NEPA establishes the format and content requirements of environmental analysis and documentation as well as requirements for public involvement and disclosure. The entire process of preparing this environmental assessment was undertaken to comply with NEPA.

The National Forest Management Act (NFMA)

I find this decision to be consistent with the long term management objectives as discussed in the Ochoco National Forest Plan as amended, except as discussed below.

Site-specific Forest Plan Amendments - Four site-specific Forest Plan Amendments are included in this decision. I find the amendment described in the EA (pages 28-30) to be non-significant based on the analysis in the EA.

Management Indicator Species - Effects to management indicator species identified in the Ochoco Forest Plan were analyzed (see “Aquatic Species” and “Wildlife” sections of this EA). The proposed action would not contribute to a negative trend in viability on the Ochoco National Forest for any Management Indicator Species.

The Endangered Species Act of 1973, as amended

Biological Evaluations were prepared to document the possible effects of the proposed activities to threatened and endangered species within the project area. The selected alternative will have no impact on proposed, endangered, threatened or sensitive plant species or aquatic species (EA Chapter 3). The project may affect but not likely to adversely affect gray wolf.

The Clean Air Act

The proposed action is designed to be consistent with the Clean Air Act. The Oregon Department of Environmental Quality (DEQ) is responsible for assuring compliance with the Clean Air Act. In 1994, the Forest Service, in cooperation with DEQ, the Oregon Department of Forestry, and the BLM signed a Memorandum of Understanding to establish a framework for implementing an air quality program in Northeast Oregon. The Memorandum of Understanding includes a prescribed fire emission limit of 15,000 tons of PM-10 per year for the Malheur, Ochoco, Umatilla, and Wallowa-Whitman national forests. All prescribed burning on these forests is coordinated with DEQ through the State of Oregon smoke management program. Alternatives 2, includes some pile burning which would be conducted in compliance with the State of Oregon Smoke Management System and would meet smoke management objectives for total emissions.

Civil Rights and Environmental Justice

There have been no issues or concerns raised regarding the interests of Native American Tribes. There are no known direct, indirect or cumulative effects to Native Americans, minority groups, women, or civil rights beyond effects disclosed in the Ochoco National Forest Land and Resource Management Plan.

Executive Order 12898 on environmental justice requires federal agencies to identify and address any disproportionately high and adverse human health or environmental effects on minority and low income populations. The action alternative would have no disproportionately high or adverse effects to minority or disadvantaged groups qualifying under the environmental justice order. Initial scoping raised no issues or concerns related to the principles of environmental justice. Implementation of the action alternative would not cause disproportionately high and adverse human health effects, high or adverse environmental effects, substantial environmental hazard or effects to differential patterns of consumption of natural resources. All interested parties will continue to be involved with commenting on the project and the decision making process.

Finding of No Significant Impact

The EA provides a thorough analysis of the expected environmental effects of Alternative 2. The information in the EA is more than adequate for me to determine that the effects are not significant.

Context

Based on the documentation in the Revised EA and project record, I have determined the following with regard to the context of the project:

The Walton Lake Restoration Project implements direction set forth in the Ochoco National Forest Land and Resource Management Plan, as amended. The Ochoco National Forest (ONF) includes about 845,498 acres; of those, about 1,810 acres were allocated in the Forest Plan to Developed Recreation Areas (MA-13). The Walton Lake Restoration Project area is limited to the 218-acre Forest Plan-designated developed recreation area around Walton Lake; the project area represents about .03% of the Ochoco National Forest and 12% of MA-13.

The selected alternative will implement sanitation harvest followed by planting of conifer and hardwood species on 35 acres, which is about 2% of MA-13 and less than 0.01% of the ONF. The selected alternative will also implement commercial and non-commercial thinning in dry mixed conifer stands on about 143 acres; this affects about 7.5% of MA-13 and 0.02% of the ONF. Given the area affected by the project at the Management Area and Forest scale, I find that the effects of the project are not significant; this is supported by the effects sections of the EA (pages 36-164), which indicate that project implementation will have a negligible effect at the Forest scale.

Intensity

Based on the documentation in the Revised EA and project file, I have determined the following with regard to the intensity of the project (40 CFR 1508.27).

1. *Impacts that may be both beneficial and adverse.* Beneficial and adverse impacts of implementing the selected alternative have been fully considered within the EA. My decision will have neither a significant beneficial or adverse impact because this project is on such a small scale compared to projects where similar activities have taken place and that have not proven to cause significant impacts.
2. *The degree to which the action affects public health and safety.* Project activities do not have significant effects to public health or safety as implementation will occur when the campground, day use area, and surrounding developed area are closed to the public. Smoke management guidelines will be followed for the limited pile burning. Overall safety of the recreation area will be improved by controlling laminated root rot in the stands where it occurs and developing a healthy stand of trees as well as reducing potential for tree mortality overall.
3. *Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.* There are no effects to unique characteristics such as historic or cultural resources. The project area does not include any Wilderness, park lands, prime farmlands, Wild and Scenic Rivers, Inventoried Roadless Areas, Research Natural Areas, or ecologically critical areas. The lake proper is a unique feature that will not be affected by project activities.
4. *The degree to which the effect on the quality of the environment is highly controversial.* As used in the Council on Environmental Quality's guidelines for implementing NEPA, the term "controversial" refers to whether substantial dispute exists as to the size, nature or effects of the major federal action. The nature of potential effects of vegetation management activities authorized by this decision is well established and not likely to be highly controversial in a scientific context. The activities and the analysis for these activities are supported by best

available science from numerous publications, which are cited in the specialists' reports and in the EA. My decision falls within the scope of the analysis for the Ochoco National Forest Land and Resource Management Plan, as amended. Consideration of all submitted and referenced literature is contained in the EA and Appendix C of this DN.

5. *The degree to which the possible effects on the human environment area highly uncertain or involve unique or unknown risks.* My decision does not involve highly uncertain, unique or unknown risks and is based on best available science, on-site field work, and extensive experience with similar types of actions. The activities authorized by this decision are well established land management practices, and the potential effects are well known and understood.

6. *The degree to which the action may establish a precedent for future actions with significant effects.* My decision and the actions authorized are not likely to establish a precedent for future actions with significant effects. The decision is site-specific to the Walton Lake Restoration Project and any future decision would need to go through the NEPA process including public involvement and consideration of environmental effects using relevant scientific and site-specific information.

7. *Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment.* The selected alternative is not related to other actions with individually insignificant but cumulatively significant impacts. The environmental effects analysis considered the potential for the effects of the Walton Lake project to overlap in time and space with the effects of other ongoing or reasonably foreseeable future projects. This cumulative effects analysis was conducted for all resources following the Council on Environmental Quality guidance provide on June 24, 2005 and is consistent with Forest Service NEPA regulations (36 CFR 220.4(f)). My review of the analysis finds that no significant adverse environmental impacts are likely to occur due to implementation of this project. (EA pp. 43, 45-47, 48-49, 55-56, 61, 72-73, 81, 91, 93-94, 96, 105, 107-108, 112-113, 116, 120, 131, 137, 140, 153)

8. *The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historic resources.* The project will have no significant adverse effect on districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places, and will not cause loss or destruction of significant scientific, cultural, or historical resources, because sites of national significance will be avoided. EA page 162.

9. *The degree to which the action may adversely affect endangered or threatened species or their habitat that has been determined to be critical under the Endangered Species Act of 1974.* The project area does not involve any critical habitat for endangered or threatened species, there is no effect to any critical habitat for listed species. Mid-Columbia steelhead and bull trout and their habitat do not occur in the project area and there is no potential for effect the species or their habitat (EA p. 134). Wolverine are not known or suspected to occur with the project area and their habitat is not present; there is no potential for impacts to the wolverine (EA p. 78, 82-83). The EA discloses potential impacts to gray wolf, which is a threatened species. No populations currently occupy the ONF and there are no known areas of wolf activity. Activities would be isolated and of short duration and would therefore not be expected to impact the

species' use of the area. The Forest Service finds that the project May Affect Not Likely to Adversely Affect. EA p. 81. The U.S. Fish and Wildlife Service has concurred with this finding.

10. Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment. I find that the actions authorized by this decision will not violate Federal, State, and local laws or requirements for the protection of the environment. Applicable laws and regulations were considered in the EA (pp. 160-161).

Predecisional Administrative Review Process

This project is subject to pre-decisional administrative review pursuant to 36 CFR 218, Subpart B (also called the "objection process"). The full text of the rule can be found here:

<http://federal.eregulations.us/cfr/title/5/28/2013/title36/chapterII/part218>.

Only individuals or organizations that submitted specific written or oral comments during a designated opportunity for public participation (scoping or the comment period on the draft EIS) may object (36 CFR 218.5). Notices of objection must meet the requirements of 36 CFR 218.8. Objections can be submitted in writing, either electronically or in hard copy, and must be filed with the Reviewing Officer within 45 days from the date of publication of the legal notice announcing the opportunity to object; the legal notice is published in The Bulletin newspaper of Bend, Oregon. The legal notice publication date is the exclusive means for calculating the time to file an objection. Those wishing to file an objection to this decision should not rely upon dates or timeframe information provided by any other source. Mailed objections must be received before the close of the fifth business day after the objection filing period closes.

Incorporation of documents by reference is not allowed, except for the following list of items that may be referenced by including date, page, and section of the cited document, along with a description of its content and applicability to the objection: 1) all or any part of a federal law or regulation; 2) Forest Service directives and land management plans; 3) documents referenced by the Forest Service in the subject EIS; or 4) comments previously provided to the Forest Service by the objector during public involvement opportunities for the proposed project where written comments were requested by the responsible official. All other documents must be included with the objection.

Minimum requirements of an objection are described at 36 CFR 218.8(d). An objection must include a description of those aspects of the proposed project addressed by the objection, including specific issues related to the proposed project; if applicable, how the objector believes the environmental analysis or draft decision specifically violates the law, regulation or policy; suggested remedies that will resolve the objection; supporting reasons for the reviewing officer to consider; and a statement that demonstrates the connection between prior specific written comments on the particular proposed project or activity and the content of the objection, unless the objection concerns an issue that arose after the designated opportunities for comment.

There are several options for submitting objections. **At this time, we strongly encourage you to submit objections electronically.**

Electronically

Electronic objections will be accepted through the Forest Service online comment system available at <https://cara.ecosystem-management.org/Public/CommentInput?project=47019>

Note that once-monthly updates to the system can briefly interfere with the public's ability to upload objections.

An alternative method for electronic submission is to this email: objections-pnw-regional-office@usda.gov Please put OBJECTION and the project name in the subject line.

Electronic objections must be submitted as part of an actual e-mail message, or as an attachment in Microsoft Word (.doc or .docx), rich text format (.rtf), or portable document format (.pdf) only. For electronically mailed objections, the sender should receive an automated electronic acknowledgement from the agency as confirmation of receipt. If the sender does not receive an automated acknowledgement of receipt of the objection, it is the sender's responsibility to ensure timely receipt by other means.

Postal Mail or Delivery

Objections delivered by mail must be postmarked by the closing day of the objection filing period and received before close of the fifth business day following the end of the objection period. If you are using postal mail or carrier (UPS/FedEx), please notify Debbie Anderson (debbie.anderson2@usda.gov or 503-808-2286) so that we may ensure your objection has been received.

Regional Forester (Reviewing Officer)
Pacific Northwest Regional Office
Attn: 1570 Objections
P.O. Box 3623
Portland, OR 97208-3623

For FedEx or UPS deliveries, please send to:

Regional Forester (Reviewing Officer)
Pacific Northwest Regional Office
Attn: 1570 Objections
1220 SW Third Avenue
Portland, OR 97204

Hand Delivery

Hand-delivery/Fax: Objections can only be hand-delivered or faxed by appointment only at this time, due to the current COVID-19 pandemic and Executive Order by Governor Brown. Please call Debbie Anderson at 503-808-2286 to make an appointment to hand-deliver your objection or request the fax number.

Implementation

Implementation of this project is expected to occur in the fall of 2020, following seasonal closure of the Walton Lake Campground.

Contact Persons / Further Information

Project records are on file at the Ochoco National Forest in Prineville, Oregon. The Environmental Assessment, Draft Decision Notice and other project documents have been made available on the internet at <https://www.fs.usda.gov/project/?project=47019>

For additional information concerning the specific activities authorized with this decision or for questions about the administrative review process you may contact Beth Peer, Ochoco National Forest, 541-516-6463 (beth.peer@usda.gov)

Responsible Official

The Forest Supervisor of the Ochoco National Forest is the official responsible for deciding the type and extent of management activities in the Walton Lake Restoration Project.

(signatures reserved for final DN)

A. Shane Jeffries

Ochoco National Forest Supervisor

Date

Appendix A - Resource Protection Measures and Best Management Practices

Project Design Criteria Included in the Selected Alternative

Project Design Criteria (also referred to as resource protection measures) are listed here to describe project design considerations that will reduce or eliminate unwanted effects and ensure project activities are implemented to comply with Forest Plan standards and guidelines.

The sources of these measures include but are not limited to: Forest Plan goals, objectives, or standards and guidelines; Project Design Criteria from the Programmatic Biological Assessment; conservation strategies; and Invasive Plant Prevention Practices. Best Management Practices are adapted from the National Best Management Practices (BMPs) for Water Quality Management of National Forest System Lands – Volume I (USDA 2012) and include conservation practices that have proven effective in protecting resource values during land management activities.

To prevent the introduction or spread of invasive plants:

1. All equipment involved in harvest operations will be washed prior to entry on NFS lands. Cleaning must remove mud, dirt, and plant parts from project equipment.
2. Ground disturbance and the exposure of mineral soil during project activities will be minimized, thereby reducing the potential for invasive plants to become established on new sites and the need to conduct revegetation activities.
3. Disturbance within existing invasive plant infestations will be minimized. Occurrence polygons are addressed and being treated through the Invasive Plant EIS, and current invasive plant populations in the project area are mapped.
4. Site shall be revegetated using native plant species and native grasses approved by a Forest Service Botanist. The Forest Service Botanist may provide native seed or provide information where it can be purchased. Revegetation utilizing seed will be a light soil prep and broadcast seeding in the first season of moisture (i.e., fall or spring) immediately following project completion.
5. Use only gravel, fill, sand, and rock that is judged to be weed free by District or Forest weed specialists.

To protect sensitive plant habitat:

6. Treatments of conifer thinning, slash piling, and burning as well as use of ground based equipment will not occur within 50 feet of areas with potential sensitive riparian plant habitat. Exceptions would be reviewed by the botanist and hydrologist or fisheries biologist. Exceptions include the use of existing roads as landings as well as lateral falling and riparian planting.
7. Vehicles, including off-highway or all-terrain vehicles, will not be operated within areas identified as sensitive riparian plant species habitat, except on existing roads.
8. Layout of harvest treatment near potential habitat for sensitive riparian plant species will be coordinated with the district botanist. Associated units are 2, 3, 4, 6, 7, and 8.

9. If any new species or populations of sensitive plants are found during project implementation, these species will be considered as described in the policy guidelines found in FSM 2670, regardless of the date of sale or other contract.

To limit wildlife disturbance and protect wildlife habitat

10. The following conservation measures related to gray wolves will be applied annually only when an active den or Area of Known Wolf Activity (AKWA) are discovered, and locations would be adjusted as new dens, AKWAs, or rendezvous sites are discovered within the project area.
- All activities associated with a proposed action, including noise and smoke-generating activity, will be restricted within one mile of a den or known rendezvous site from April 1 through July 15. Further discussion and coordination with the Service may result in modified distances or flexible dates for this specific PDC. Additionally, if topographic features or terrain clearly separates the den or rendezvous site from project-generated disturbances, seasonal restrictions may be adjusted or eliminated. These design features avoid or minimize disturbance at active den or rendezvous sites that could disrupt reproductive success or result in adverse effects.
 - a. Early rendezvous sites are typically close to dens; implementing PDC within one mile of den sites generally mitigates the effects to early rendezvous sites when pups are vulnerable.
 - b. Dens used in consecutive years but not used in the current year may also have associated PDC if the Forest Service biologist and/or Oregon Department of Fish and Wildlife (ODFW) and the Service deem it necessary.
 - c. If a den is discovered during project implementation of a vegetation or fuels management project, PDC shall be implemented, and the Forest Service will coordinate with ODFW and the Service to ensure PDC are implemented.
 - Additional conservation measures include:
 - a. To improve habitat effectiveness and reduce overall disturbance, it is recommended temporary roads associated with timber sale activities be decommissioned at the conclusion of the timber sale.
11. Project activities which may cause disturbance will receive the following restrictions listed below. In addition, if a previously unknown occupied nest is discovered the following periods of restriction will apply to harvest and post-harvest activities, where appropriate:
- Bald Eagle: A seasonal restriction (January 1 to August 31) will exist for all activities within 0.25 mile (non-line-of-sight), 0.5 mile (line-of-sight), or 1 mile (for blasting) of known bald eagle nests.
 - Golden Eagle: A seasonal restriction (March 1 to August 15) will exist for all activities within 0.5 mile of known nests.
 - Osprey: A seasonal restriction (March 1 to August 1) will exist for all activities within 0.25 mile of known osprey nests.

- Northern Goshawk: A seasonal restriction ((March 1 to August 31) will exist on all activities within 0.5 mile of known goshawk nests. This restriction period would also apply to hauling (excluding arterial and collector roads), new road construction, and road reconstruction within 0.25 mile of active nests.
- All Other Raptors: No management activities (including underburning) will occur within 330 feet of nest site (primary zone). Between 330 and 660 feet around a nest site (secondary zone), modified habitat treatments are permitted. Modified treatments are intermediate treatments between that required in the primary zone, and that normally prescribed outside the whole protection zone. Operations would be restricted for both primary and secondary zones between March 1 and August 1. Exceptions would be evaluated on a case by case basis by District wildlife biologist.

To protect the soil and water resources:

12. All ground-based equipment will be confined to areas less than 35% slope.
13. Best Management Practices (BMP) will be incorporated into the project design and/or implementation to minimize effects to soil and water resources (see Appendix A).
14. Skid trail and landing locations will be designated and approved by the Contract Administrator prior to commencement of work.
15. Machinery used to grapple pile in Units 2, 3, and 4 will be limited to skid trails and landings utilized for harvest and yarding operations.
16. Water bars will be installed and woody debris will be placed on all skid trails located on slopes over 10%.
17. Temporary roads will be obliterated and rehabilitated following completion of commercial harvest activities by blading back displaced soil, tilling the surface with a subsoiling implement where soil depths are sufficient, installing water bars and/or placing woody debris on the surface, and seeded with native grass seed.
18. Landings will not be located within Riparian Habitat Conservation Areas.
19. Skid trails will be minimized within RHCAs and will be located outside of core stream buffers (50 feet class 3; 25 feet class 4) on upland vegetation only.
20. Machine traffic to fell and bunch trees on upland plant communities within RHCA buffers will be limited to two or fewer passes.
21. Machine traffic will not be permitted within 50 feet of Class 3 and 25 feet of Class 4 streams.
22. Where available, large fir will be felled into stream channels to meet INFISH instream wood objectives of 20 pieces per mile.
23. Within RHCAs in the safety corridor of units 2, 3, 4, trees that cannot be reached by machinery from the existing road will be hand-felled. (all fir trees according to sanitation rx)
24. Precommercial thinning slash will be left on the ground within 25 feet of any stream.

25. Winch lining of harvested material from areas of steep slope where machines cannot operate without excess disturbance is authorized.
26. When harvest operations are complete, skid trails located within RHCAs will be contoured to the degree possible; surface will be smoothed, scarified and covered with organic woody material; water bars will be installed.
27. Subsoil landings and primary skid trails in treatment Unit 1, 2, 3, 4 and 5 if overall detrimental soil disturbance levels exceed 20% following the proposed harvest, yarding, and fuels treatment activities.

To minimize risk of mass wasting:

28. Springs and landslide-prone areas less than 1 acre will be protected by a slope distance of 50 feet.
29. Unstable terrain and springs greater than 1 acre will be protected by a buffer of 150 feet.
30. If there is any indication of recent landslide activity, the area will be evaluated by the geologist and the buffer may be increased.

To protect scenic values within the Developed Recreation Management Area:

31. Non-commercial thinning stump heights will not exceed 8 inches and will be flush cut within 150 feet of campsites, roads, trails and other recreation improvements. Stumps of commercially sized trees within 150 feet of campsites, roads, trails and other recreation improvements will be 8 inches when the project is complete; some stump heights will initially be higher than 8 inches to facilitate safe tree falling practices and will be cut lower before the project is completed. Stumps within 100 feet of Forest Road 22 will be 4 inches when project is complete.
32. Tree marking paint will be used to designate trees to be harvested (as opposed to trees to be retained) in visual corridors on Forest Service Roads 22 and 2220.
33. Paint will be blacked out on boundary trees that are visible from Forest Service Roads 22 and 2220 and designated trails.
34. Grapple piles will be located more than 600 feet from Forest Road 2220.
35. Landings will not be located within 300 feet of Forest Road 2220 or within 100 feet of Forest Road 22.
36. Landings will be seeded with native grasses when operations are completed.
37. Recreation specialists will assist with designating trees to be commercially and non-commercially removed, and with tree planting specifications that are immediately adjacent to camping sites, facilities and trails to ensure visual considerations are incorporated. Recreation specialists will also assist with tree planting specifications. Such visual considerations include screening, views of the lake, and diversity of vegetation.

To ensure public safety:

38. The public will be notified through press releases and postings on the ground when the area is closed due to operations.

39. Harvest activities, non-commercial thinning and pile burning will occur when the campground is closed.
40. Summer and winter trails in or near treatment units will be closed to the public during harvest, thinning operations and when piles are burned.

To protect the investment in the facilities at the developed campground:

41. Operations will maintain a buffer distance of 25 feet around campsite amenities to protect the facilities and ground around them to the extent possible.
42. When work is required inside campsites, fire rings and picnic tables moved as a result of the project will be moved to the original or preferred relocation site after the project is complete; an Ochoco National Forest recreation planner will provide guidance during project implementation.
43. Trails will be avoided wherever possible. Official trails will have designated crossings and if damaged as a result of the operation will be reconstructed to previous condition.
44. No equipment will be permitted to operate within 25 feet of the well & solar powered water fountain; this includes the well (located under the water fountain box), concrete slab, the water fountain, and the solar panel (mounted on a steel pole).
45. No trees will be felled on or felled to land within 10 feet of the well.
46. If the well is damaged during implementation, project implementation must stop around the well and may not continue until the well is properly sealed to protect the aquifer.
47. No large equipment is permitted to operate within 10 feet of the old water spring and cistern.
48. No trees will be felled on or felled to land within 10 feet of the old spring and cistern.
49. No large equipment is permitted to operate within 10 feet of the vault toilets.
50. No trees will be felled or felled to land within 10 feet of the toilets.
51. No large equipment is permitted to operate within 10 feet of the host site septic system, including the septic tanks and the buried septic pipes and drainfield.
52. No trees will be felled on or felled to land within 10 feet of the host site septic system.
53. If the project requires any excavation, utility locate services will be called to verify if there are any buried utilities (owned by power company, etc.) in the area.
54. Any damage to any of the facilities and roads will require the Contractor to arrange for inspections, repair, and/or replacement of the facilities at the Contractor's expense. All repairs and replacements must be approved by the Forest Service.
 - a. Damage to the well, solar fountain water system, or septic system must be inspected by the Forest Engineering staff, prior to making repairs. Damages to these facilities may also require further investigation by State Authority.
 - b. Repairs made shall match existing materials, appearance, and function.
 - c. Replacement facility components shall match existing.

To protect the trail system:

55. Skidding across trails will only be permitted at designated crossings. Trails will be rehabilitated when operations are completed.

To protect paved roads and parking areas:

56. No tracked equipment will operate on paved roads unless approved protection measures are used to prevent damage to pavement.
57. No trees will be felled across paved roads or onto parking areas.
58. Log haul on paved roads will be minimized by only using the portion of the paved 2220 road that is necessary to reach the harvest units. By taking this approach on road use, no log haul or heavy equipment mobilization will need to pass over the bridge and dam where Walton Lake flows into Cady Creek.

To reduce risk of increasing fuel hazard:

59. Trees commercially harvested will be whole-tree yarded when possible and processed at the landing to reduce the amount of slash left in the woods. Trees too large to be skidded whole would have tops attached to the last log.
60. Cull logs, including logs on the ground, will be defined as logs in excess of what is needed to meet Forest Plan requirements for wildlife habitat; these would be removed and hauled off site or piled for burning outside of fire season.
61. Remaining slash and pre-commercial thinning slash will be concentrated in handpiles to be burned outside of fire season.

To retain old tree structure:

62. Retain all live trees with old tree characteristics in Units 1 and 5 regardless of size unless determined to be a safety hazard. Identification of old trees is based on the Van Pelt 2008 guide and includes bark characteristics, branching structure, and crown form.

Appendix B - Best Management Practices Included in the Selected Alternative

Road Management Activities

- Restrict road use during exceptionally wet periods (particularly during active melt) when use would likely damage the roadway surface or road drainage features.
- Use suitable measures to avoid or minimize adverse effects to soil, water quality, or riparian resources when proposed operations involve use of roads by traffic and during periods for which the road was not designed.
 - Strengthen the road surface in areas where surfaces are vulnerable to movement such as corners and steep sections.
 - Upgrade drainage structures to avoid, to the extent practicable, or minimize direct discharges into nearby waterbodies.
 - Restrict use to low-ground-pressure vehicles or frozen ground conditions.
 - Strengthen the road base if roads are tending to rut.

- Adjust maintenance to handle the traffic while minimizing excessive erosion and damage to the road surface.
- Ensure that drainage features are fully functional prior to commencement and upon completion of seasonal operations. Shape road surfaces, construct or reconstruct drainage control structures as needed, ensure that ditches and culverts are clean and functioning, and remove sidecast berms (i.e., those resulting from road grading) unless specifically designed for erosion control purposes.
- Inspect drainage structures and road surfaces after major storm events and perform necessary maintenance and stabilization.
- Inspect roads frequently during all operations. Restrict use if road damage such as unacceptable surface displacement or rutting is occurring.
- Maintain the road surface drainage system to intercept, collect, and remove water from the road surface and surrounding slopes in a manner that reduces concentrated flow in ditches, culverts, and over fill slopes and road surfaces.
 - Clean ditches and catch basins only as needed to keep them functioning.
 - Do not undercut the toe of the cut slope when cleaning ditches or catch basins.
 - Use suitable measures to avoid, to the extent practicable, or minimize direct discharges from road drainage structures to nearby waterbodies.
- When plowing snow, move snow in a manner that will avoid or minimize disturbance of or damage to road surfaces and drainage structures. Mark drainage structures to avoid damage during plowing. Use snow berms as appropriate to avoid concentration of melt water. Discontinue snow plowing when the activity would likely damage the roadway surface and road drainage features.

Temporary Roads

- Use applicable practices of BMP Road-2 (Road Location and Design) to locate temporary roads.
- Use applicable practices of BMP Fac-2 (Facility Construction and Stormwater Control) for stormwater management and erosion control when constructing temporary roads.
- Install sediment and stormwater controls before initiating surface-disturbing activities to the extent practicable.
- Schedule construction activities to avoid direct soil and water-disturbance during periods of the year when heavy precipitation and runoff are likely to occur.
- Routinely inspect temporary roads to verify that erosion and stormwater controls are implemented, functioning, and appropriately maintained.

Ground-Based Skidding and Yarding Operations

- An erosion control plan will be in place that covers all disturbed areas including skid trails, roads, and landings.

- Operate equipment when soil compaction, displacement, and erosion would be minimized.
- Suspend harvest and skidding operations when soil moisture levels could result in unacceptable soil damage (particularly during thaw).
- Use existing roads and skid trail networks to the extent practicable.
- Machinery will not operate on slopes >35%. On slopes >35% and less than 100 feet long, directional hand-falling of trees to skid trails is permitted.
- Rubber-tired skidders will be restricted to approved skid trails and landings.
- Limit, as feasible, tracked machinery from pivoting or travelling sidehill on slopes greater than 10%. Travel should occur mostly perpendicular to the contour of the slope.
- Repetitive machinery passes on off-track trails ("ghost trails") will be minimized. Limit travel over the same piece of ground to two passes or less.
- Minimize the size and number of landings as practicable to accommodate safe, economical and efficient operations. Landings should be located to minimize the number of required skid roads. Re-use existing landings. Install suitable temporary erosion control measures where needed to prevent sediment transport away from the landing.

Fuels Treatment

- Post-harvest mechanical whip falling and piling shall occur from existing skid trails to the extent feasible to limit additional soil displacement and compaction.
- Machine-constructed slash piles shall be located on primary travel routes, skid trails, and landings to the extent feasible to limit severely burned conditions and surface organic consumption.

Appendix C – Consideration of Public Comments on the 2019 Revised EA

Opportunity for public comment on an Environmental Assessment includes during scoping or any other instance where the responsible official seeks written comments (36 CFR 218.5(a)). For the Walton Lake Restoration Project Revised Environmental Assessment (Revised EA), public comments were sought during scoping (August 7, 2019 – September 6, 2019) and when the Revised EA was released (February 18, 2020 – March 19, 2020). The forest also accepted comment at a public meeting held June 25, 2019.

This appendix is intended to document the Forest’s consideration of comments received during the 30-day public comment period on the Revised EA.² A total of 21 comment letters were received from individuals or organizations. Full text of all comment letters are on file at the Ochoco National Forest. The Forest Service appreciates the time and effort people put in to providing these comments.

All written comments and public input have been considered during the decision-making process for the Walton Lake Restoration Project. The responses provided here fulfill the agency’s requirement to assess and consider comments individually and collectively. Based on comments received, the Forest Service has made corrections and clarifications in the EA as noted below in the responses.

Table C-1: List of commenters

1	Asante Riverwind
2	Irene Jerome, AFRC
3	Anon
4	Adam Bronstein
5	John Carter
6	Amy Hansen
7	Rebecca Canright
8	Ralph McDonald
9	Kima Garrison
10	Mary Abramson
11	Mark Canright
12	Jan Zuckerman
13	Michele Dieterich
14	Karen Coulter / Tom Buchele, BMBP
15	Vincent Reynolds
16	Margaret Chapple
17	Doug Heiken, Oregon Wild
18	Carolina Hood
19	Seth Crawford, Jerry Brummer, Brian Barney (Crook County Court)
20	Cory Bettinger
21	Joel Geier

Comments and Responses

The following comments, arranged by topic, are followed by the Forest Service response. Similar comments are grouped and given one response. Not every comment is listed here (statements may have been summarized or paraphrased to reduce paperwork), but sufficient representative statements are provided to reflect the sentiment, issue, or concern. The number following the comment indicates the

² The comment period for the 2017 Environmental Assessment generated 19 letters. Consideration of those comments is located in the project record.

commenter as listed above in Table C-1. References to the EA are to the July 2020 EA released during objection period.

PURPOSE AND NEED / RANGE OF ALTERNATIVES

1. **Comment:** *The purpose and need statement is unreasonably narrow and therefore the range of alternatives is unreasonably narrow. (14)*

Consideration: The purpose and need is based on direction in the Forest Plan and the conditions in the project area as described in the EA on pages 1 through 5. A full range of alternatives that addresses the key public concerns has been analyzed. Key public concerns are outlined in the EA on page 9 to 10 were used to develop Alternative 3 and 4. Six additional alternatives were considered but eliminated from detailed study as described in the EA pages 30 to 31.

2. **Comment:** *The purpose and need statement is basically a description of the proposed alternative, just stated as the rationales behind the proposed action alternative. (14)*

Consideration: According to CEQ's NEPA regulations, a statement "shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action." 40 CFR 1502.13. The EA provides the underlying purpose and need (the rationale) for the proposed action; it explains why the agency has considered taking action. EA pp. 1-5.

3. **Comment:** *Stating the project need in "public safety" terms would too narrowly frame the EA purpose and need statement; should consider the legal context of the action; and ignores LRMP management objectives. (14)*

Consideration: The Forest Plan provides the focus on public safety within Developed Recreation Management Areas. The Forest Plan directs the Forest Service to utilize all methods to prevent or suppress insect and disease outbreaks there, emphasizing detection and treatment as bark beetle and root disease relate to providing a safe environment. EA p. 4.

4. **Comment:** *BMBP suggests a purpose and need statement of "protecting public safety without adversely impacting or destroying the qualities that make the area so suitable and popular for recreation."*

Consideration: The proposed action includes a number of project design criteria that will eliminate or minimize negative effects of the proposed activities. The effects analysis do not indicate that the qualities that make Walton Lake a popular recreation site will be destroyed, in fact camping and water recreation will not be affected by project activities except for possible delay in opening the site to the public if activities are not complete.

5. **Comment:** *AFRC recommends that a fifth alternative, Alternative 5, be prepared that would permanently close the Walton Lake recreation area to the public for an indefinite time. The effects to the County, to the recreating community and to the natural resources of the area should be analyzed. (2)*

Consideration: Closing the entire area to the public would not meet the purpose and need. The assumption for the analysis of No Action is that areas infested with laminated root rot would continue to be closed for public safety purposes.

6. **Comment:** *The project is a dramatic shift in management approach. The FS has not provided a convincing reason why it suddenly needs to cut down 500 old growth firs... (14)*

Consideration: This is not a dramatic shift in management approach; rather in Units 2, 3 and 4 (not across the project area) it is a laminated root rot treatment approach grounded in the Forest Plan, best available science, and recommendations of the Forest Pathologists, Forest Entomologists,

and an Area Ecologist responding to a growing concern raised by recreation staff about the amount of trees falling in part of the Walton Lake project area. The Forest Service followed scientific protocols for addressing the presence of this root disease by first methodically mapping its occurrence, and noting increased severity as evidenced by numerous dying and newly dead host trees. These Forest Service experts also reviewed the body of science regarding treatment options for recreation areas and in the context of the specific management objectives at Walton Lake, and based on their professional judgement, made recommendations to the Responsible Official.

7. **Comment:** *Materials should be disseminated to the public to help less informed citizens understand that any options that would require removing only a few trees every year, inspecting the roots of all the trees every year, and limiting the scope of the laminated root rot removal within the developed recreation area are not feasible from both an operational and economic standpoint. (2)*

Consideration: The EA makes the distinction between hazard tree inspection/removal and proactive management to treat a stand infested with root rot. See response to comment #14.

8. **Comment:** *The stand density claimed by the Forest Service to be increasing wildfire risk could easily be mitigated by only small diameter thinning (generally up to only 6-8" dbh) where needed and some prescribed burning in the dry mixed conifer. This would cause little detrimental effect to recreational, scenic, and wildlife values compared to the planned heavy clearcut-style logging of "Sanitation harvest" and the extensive commercial thinning with removal of large trees across much of the rest of the recreation area. Based on our field surveying of all of the proposed sale units, there is no excess density of mature and large trees, as the Walton Lake area has evidently been thinned in the past, as well as having received repeated hazard tree felling over many years. Yet the Revised EA omits this information and thereby avoids considering only noncommercial small tree thinning by hand and prescribed burning as a viable alternative.*

We were hard-pressed to find any significant evidence of large fir "crowding" older legacy Ponderosa pine and Western larch as claimed in the Walton Lake project area due to past thinning, past hazard tree felling, and in the case of the root rot area, either heavier past logging or a possible past fire. (14)

Re: purpose # 2 (on Revised EA p. 11), the dry mixed conifer stands appear to be healthy now. The only higher density is small patches of small trees that could be non-commercially thinned by hand with little impairment of scenic and recreational values. However higher density of small trees is not consistent across the area and where it does exist in small patches, these currently provide screening for campsites, hiding cover for wildlife, and a desired recreational attribute of variable tree sizes and variable tree density, as well as tree species diversity. (14)

Consideration: The purpose and need is based on site-specific data gathered at the Walton Lake Developed Recreation Management Area. It is acknowledged that the stands within the Developed Recreation Management Area are not homogenous and the density is variable across the area. The EA does acknowledge past thinning and hazard tree removal has occurred. However, there are high stand densities present that increase vulnerability to western pine beetles and/or mountain pine beetles. In the dry mixed conifer stands, the Forest Service has estimated that about 90% of large (20" + DBH) ponderosa pine are growing under conditions of elevated stand densities that make them susceptible to bark beetle attack. Most overstocking comes from smaller understory trees and young shade-tolerant grand fir and Douglas fir growing in close proximity to large legacy pine trees. EA p. 36. The units are divided into those that are in need to thinning up to commercial size trees, and those that only need small tree thinning. The majority of the dry mixed conifer acres (100 out of 143 proposed for thinning) only need small-tree thinning (generally less than 9" DBH). Project design would maintain screening around campsites.

To clarify, sanitation harvest is not based on density, and it is not intended to reduce wildfire risk, though removing the slash is a fuels treatment. Units 1, 5, 6, 7, and 8 are proposed for thinning to reduce density. Thinning from below also reduces ladder fuels which can cause flames to reach into the crowns of larger trees.

9. **Comments:** *Root rot happens. As we get older we rot a bit. Let the forest do its thing and become a part of future soil and carbon stores. Signage to warn visitors of the hazards should be retained to protect the public. (13)*

EA did not include an alternative that called for posting signage around units 2-4 advising recreationalists of possible hazard trees created by root rot but without a concurrent closure order. (14)

Signage to warn the public of dangerous conditions created by root rot is a viable alternative to cutting large valuable wildlife trees, especially in areas that are not too crowded. This also presents an opportunity for public education about the value of natural processes and deadwood habitat. (17)

Consideration: In Developed Recreation Management Areas, laminated root rot is considered one of the most hazardous root diseases to people and property in developed sites (Filip et al. 2014). There currently is signage in place along the loop road adjacent to Units 2-4 to warn visitors of the danger of trees falling without notice (see Figure 28 in the EA). The commenter is suggesting that a Forest Order is unnecessary to enforce a closure of the area to keep the public out, however an Order is the means by which closures are enforced. The safety concerns are serious enough to warrant a formal closure rather than just signage alone. If the stand were not part of a Developed Recreation Management Area, where people are invited to recreate and spend time, general warnings about entering the Forest would be more appropriate (see comment #18 regarding general precautions for forest visitors).

10. **Comment:** *Another unanalyzed issue is the EA's failure to consider that leaving the Developed Recreation site in an altered state (the marked and flagged timber sale) and with a public entry closure and associated fines does not represent a true No Action alternative, which is supposed to represent the status quo condition and management of the area prior to the proposed timber sale or other new management currently proposed, according to NEPA. (14)*

Consideration: The No Action alternative is described in the EA p. 13. Forest Service NEPA regulations state that an EA may document consideration of a no-action alternative through the effects by contrasting the impacts of the proposed action and any alternative(s) with the current conditions and expected future condition if the proposed action were not implemented (36 CFR 220.7(a)(2)(ii)). The current condition does in fact include a public entry closure. The status quo includes a 35 acre stand of fir trees infested with laminated root rot, which managers deem a public safety hazard and have therefore closed to entry. Additionally, the condition of the infested area has changed as the planning process has been underway: more trees are dying on an annual basis.

11. **Comment:** *Enhancing hardwood species could be accomplished simply by planting them where there is a deficit and non-commercially thinning only small trees (up to 6-8" dbh) where needed to increase sun access where riparian hardwoods would naturally grow. No commercial logging is needed. There are already nice areas of hardwoods; this is hardly a noticeable "need" at all. (14)*

Consideration: Hardwood enhancement does call for removing small conifers and planting hardwood species in riparian and upland areas. Hardwoods provide wildlife habitat, visible interest, and screening around camp and picnic sites. Some hardwood planting occurred immediately after the project was authorized through a 2015 Decision Memo. Where commercial thinning is proposed (43 acres), it is for the purpose of removing competition stress from around pine and larch thereby improving their resiliency and reducing risk of bark beetles.

12. **Comment:** *The Revised EA presents a very negatively biased portrayal of the No Action alternative: “The No Action alternative provides a display of trade-offs of allowing forest health issues to go untreated across the entire Developed Recreation Management Area.” (EA p. 10) This omits the role of immediate hazard tree assessment and felling every year for public safety regarding forest health issues and the continued use of root rot hazard tree warning signs. (14)*

Consideration: The NEPA process is put into motion when an agency has formulated a proposal. The Forest Service has proposed Alternative 2 as a means to address the conditions outlined in the EA at pages 1 through 4. The No Action alternative serves as a baseline for comparison of the action alternatives, and is not the Forest Service preferred alternative. The No Action means that no action would take place to address the purpose and need. The EA clearly states that under No Action, annual hazard tree inspections would continue (p. 13).

13. **Comment:** *The first alternative listed that was rejected for in-depth analysis (logging smaller patches of root disease areas), rather than being rejected because logging is known to spread root rot, is rejected on the narrow basis that “this would leave infested untreated areas between group openings [mini clearcuts] and this does not follow recommended management guidelines to curb impacts of the disease.” (Revised EA p. 30) These “recommended management guidelines” adopted by the Forest Service are the only approach the Forest Service is considering valid for the proposed action and so the rejection of this alternative for detailed analysis is thus predetermined by the proposed action.*

Consideration: The alternative of conducting sanitation treatment on small patches 2-5 acres was dismissed from detailed analysis because is not supported with the best available science on the subject to treating laminated root rot in this location in part because of its diffuse and widespread distribution after confirming its presence during in-depth field surveys. It is also similar to Alternatives 3 and 4. Treatments designed to reduce the number of highly susceptible hosts present and plant resistant or tolerant tree species would not “spread laminated root rot” based on analysis.

14. **Comment:** *The second public alternative listed that was denied in-depth analysis is to survey and remove root disease trees annually. The rationale for rejecting the reasonable normal practice of identifying and felling immediate hazard trees (as is already done at Walton Lake every year) is here rejected due to lack of economic value for the timber industry, which is possibly the real driving motivation behind this sale: “this approach would extend the amount of time to reestablish a new healthy stand of rot-resistant species; falling a few trees each year would not provide the ability to economically remove the trees for salvage or timber value and they would become fuel on the forest floor....”*

This means that the Forest Service is precluding public alternatives as unreasonable if they “extend the amount of time” to convert the moist mixed conifer mature and old growth stand artificially to “rot resistant” species through clearcutting and replanting (the proposed action) and if the alternative would not “economically remove the trees for salvage or timber value”, which is not stated as a primary purpose for this sale, and if the alternative allows the felled trees to become “fuel” on the forest floor.

Consideration: In-depth surveys were conducted and indicate there are many live trees in addition to dead and dying grand firs and Douglas-firs infected with laminated root disease in Units 2, 3 and 4 that present ongoing public safety concerns in this popular Developed Recreation Management Area. The alternative of annually removing diseased trees was considered but not analyzed in detail because it is essentially the same as Alternatives 1 and 4 in the laminated root disease-infested stands (Units 2, 3, and 4) where annual inspections and falling of hazard trees occurs annually before opening the site. Ponderosa pine, western larch and hardwoods that are more tolerant or resistant to laminated root rot are already present in these units at varying levels. The extent of the root disease has been determined and it is widespread in Units 2, 3, and 4, but unless a tree rates as

an immediate hazard then NEPA is still required to fall and remove it (which is the purpose of the proposed action and the preparation of this Environmental Assessment).

The primary purpose and need cannot be met with the proposed alternative because a healthy stand could not be developed and the area would remain closed. Economic value of the trees to be removed is not a primary purpose of this project; however, allowing the ongoing mortality and then allowing all of the trees to remain on the forest floor is not a viable option and the value of the trees helps to offset the cost of getting the trees removed.

15. **Comment:** *Alternatives 3 and 4 have already been rejected out of hand, judging by the Forest Service response to this publicly offered alternative. Again, the Forest Service is predetermining the outcome rather than seriously considering the full range of high quality science and reasonable alternatives suggested by the public. (14)*

Consideration: There is substantial difference in the alternatives analyzed in detail. These alternatives (3 and 4) were specifically developed to address issues raised by some commenters as disclosed in the EA pp. 10-11, 16, and 18. The EA provides the public and the decision maker a comparison of the trade-offs between the alternatives. The reasons that other options and project design were not analyzed in detail is explained in the EA pp. 32-33.

PUBLIC SAFETY, HAZARD TREE POLICY, AND AREA CLOSURE

16. **Comments:** *The Forest Service is misusing the guise of so-called 'public safety' and mischaracterized 'hazard' trees as a pretentious excuse to attempt logging in the Walton Lake recreation area. This thinly disguised logging project is being proposed despite the fact that the Forest Service is already capable of taking necessary action to remedy situations that actually have real 'hazard' trees present. The Forest Service has maintained public safety in the area for decades by annually inspecting for and removing true hazard trees. (1, 3, 11, 13)*

The USFS still offers no explanation; scientific, ecological, or even economic; why it has instead chosen to unnecessarily expand the scope of such activities into a full-on logging project. (1, 3, 11)

There is no need to log mature and large trees in the Walton Lake area. The Forest Service already identifies and fells legitimate hazard trees that could threaten public safety in the recreational use area every year. This would not change regardless of the outcome of this sale. (1, 18)

Why is legitimate immediate hazard tree removal suddenly not considered sufficient, even though it has been successfully used by the Forest Service in the Walton Lake area and throughout the rest of the Ochoco National Forest? (14, 15)

The public generally accepts hazard tree felling as a sufficient way to ensure public safety in recreational areas and across the rest of the Forest. (14)

Consideration: Hazard tree policy, found in Forest Service Manual 2330 is specific to developed sites (as defined in FSM 2330).

The Forest Service continues to survey for and mitigate hazard trees in the developed site, along the access road, and along the loop road. Nothing in this project eliminates the ongoing hazard tree identification and mitigation that takes place every year prior to opening recreation sites.

Above and beyond hazard tree identification and management, this project is approaching the forest health issues in a proactive manner for the entire Developed Recreation Management Area. Trees continue to die every year, either falling or creating hazards that need to be felled. The amount of mortality has escalated over the last several years in Units 2, 3 and 4. A recent site visit identified approximately 40 trees that were posing a hazard to the recreating public and needed to be felled prior to the area opening. This information has been added to the EA, with additional photos.

Developed recreation areas need to periodically have forest health evaluations and at times, long-term planning efforts to address public safety concerns related to on-going hazard tree issues and underlying forest health conditions (Harvey and Hessburg 1992, Filip et al. 2014). Forests and vegetation in recreation areas are dynamic and change due to disturbances. Without a long-term approach, hazard trees may continue to be removed without planning for replacement of overstory trees without regeneration in mind or without considering forest diseases and insects that can impact public safety, management options, expectations, stand structure and fuel profiles. A primary objective of this project is to promote healthier forest stands by reducing forest insect and disease levels in the long-term related to public safety concerns. Forest Service employee safety is another consideration when hand-felling many decayed trees over time, whereas to have a contractor remove all diseased, hazardous trees at one time, the risk of exposure is reduced.

17. **Comment:** *Most of the trees in units 2-4 are not diseased or likely to become diseased for many years and as such they present absolutely no danger to Walton Lake recreationalists in their ordinary activities in the recreation area. Even trees that wouldn't identify as hazards but may present invisible danger are outside the most frequently used area and are not easily accessible as they do not contain trails. (14)*

The EA grossly exaggerates the public safety issues outside of the campgrounds and along trails. There is no evidence that under Forest Service guidelines, trees infested with or susceptible to laminated root rot create real hazards or could be considered hazard trees when located away from the developed campgrounds and roads. (14)

Basing the project on just two incidents of mortality in dispersed settings away from developed campgrounds is grossly overreacting to actual safety hazards in the project area. (14)

Consideration: A thorough inventory of the area was completed and includes an assessment of the spatial extent and severity of the infestation. In-depth surveys indicate there are many grand firs and Douglas-firs with root and stem decays. Though the area of laminated root rot infestation is not directly within the campground, it is within the Developed Recreation Management Area adjacent to the developed facilities, entrance road, kiosk, loop road, and hiking trail. Based on past and current monitoring (most recently in May 2020), the number of dead and dying trees in stands confirmed to have laminated root rot in grand fir and Douglas-fir continues to increase every year with structurally unstable trees posing a threat to public safety. The best available science tells us that laminated root rot infestations are a serious issue. See EA at 2. Also see response to comment #26.

18. **Comments:** *The forest Service has a policy to advise visitors to recreate at their own risk, requiring visitors to be aware of surrounding hazards and to avoid hazard areas during particularly windy days. (citing <https://www.fs.usda.gov/visit/know-before-you-go/hazard-trees>.) (14)*

Recreational visitors are far more likely to be killed in a traffic accident on their way to or from Walton Lake than to be seriously injured or killed by a falling tree, and they know that. The Forest Service must know that too. People know they are taking risks when they enter a natural forest and they choose to go there anyway. (14)

Consideration: The web page cited in the comment provides general safety tips for visiting National Forests related to the potential for trees to fall. The Forest Service provides additional information on safe visits to National Forests and Grasslands here: <https://www.fs.fed.us/safety/>. Forest Service Manual 2330 is specific to developed sites (as defined in FSM 2330) and in 2332.03 under *Policy*, it states, "Hazard trees will be managed in developed sites to reduce risks to all users. Safety is the predominant consideration in developed site operation and maintenance and takes priority over biological or other considerations."

The Ochoco Forest Plan provides policy for providing a safe environment in the Developed Recreation Management Allocation. There is no other management allocation on the Ochoco NF that has such an emphasis on providing for public safety. See Table C-2, below where the application of management direction for the Developed Recreation Management Area is displayed. The standard associated with forest health reads “Utilize all methods to prevent or suppress insect and disease outbreaks. Emphasize detection and treatment of bark beetle and root disease occurrences, as these relate to providing a safe environment.”

19. **Comment:** *The Forest Service is treating the developed site and visual influence area as if they should be managed in exactly the same way in terms of identifying and eliminating potential safety hazards. [referencing FMS 2332.1 Public Safety] (14)*

Consideration: The EA shows that the management emphasis and most standards and guidelines for the Developed Recreation Management Area apply to the entire management area, so yes they are to be managed in the same way. See Table C-2 below. The information in Table C-2 is located in the EA pp. 5-7. Based on public comments received such as this one, the standards have been put into tabular form here to help clarify the Developed Recreation Management Area guidance and how it is applied within the developed site and visual influence area.

All direction is the same for both the developed site and visual influence area except for standards related to harvest practices and reforestation. The visual influence area does involve infrastructure: Units 2, 3 & 4 are between paved roads (near the main 22 Rd, along entrance and loop roads), behind the entrance gate, have a fee station, information kiosk, campground, paved road, parking pull-offs and trail in them or immediately adjacent to them with visitors recreating in them before the closure.

Table C-2. Management Direction Pertaining to the Developed Recreation Management Area

	Developed Recreation Management Area (MA-13) (Project Area)	
Forest Plan Component	<i>Developed Site</i>	<i>Visual Influence Area</i>
Management Emphasis	<i>(4-71):</i> Provide safe, healthful, and aesthetic facilities for people to utilize while they are pursuing a variety of recreational experiences within a relatively natural outdoor setting.	
Standards and Guidelines	<i>Forest Health (4-153):</i> Utilize all methods to prevent or suppress insect and disease outbreaks. Emphasize detection and treatment of bark beetle and root disease occurrences, as these relate to providing a safe environment. Control of defoliators in the mixed conifer type is also emphasized to meet visual objectives.	
	<i>Harvest Scheduling (4-213):</i> Harvest only for the purpose of maintaining safe and attractive recreational sites. No scheduled timber harvest. <i>Reforestation (4-213):</i> Rely primarily on natural regeneration. Planting may be done to meet management area objectives.	<i>Silvicultural Systems (4-213):</i> Both even and uneven-aged systems may be used. Emphasize maintenance of large, ponderosa pine and western larch. <i>Cultural Treatments (4-213):</i> Precommercial thinning and commercial thinning may be done to meet the visual quality objectives and maintain healthy stands. <i>Harvest (4-213, 4-215):</i> Cutting practices may be used that meet the following objectives in mixed

		<p>conifer: 2-5 acre even-aged units.</p> <p><i>Harvest (2-214):</i> Manage ponderosa pine to encourage large trees and open park-like stands. Manage mixed conifer for a mix of species with emphasis on maintaining western larch where possible. Provide views of scenic features such as aspen stands or rock outcroppings.</p>
	<p><i>Forest Residue (4-158):</i> Manage residues to allow light natural accumulations of dead and down woody debris. A natural appearance consistent with stand types is the goal of activity fuel treatments and vegetation management (see photo series for desired residue profiles for this prescription area).</p>	
	<p><i>Recreation Opportunity Spectrum (ROS) (4-179):</i> Roaded Modified tending to Rural.</p>	
	<p><i>Visual Quality Objectives (4-192):</i> Retention. [note the scenic views analysis describes how the Scenery management System replaced the Visual Management System of the Forest Plan, p. 61]</p>	
	<p><i>Wildlife, Big Game habitat (4-260):</i> Manage to provide for big game, while meeting the primary emphasis for the specific management area. There is no cover objective or minimum cover requirement for these areas. Cover will be incidentally provided through implementation of management prescriptions.</p>	
	<p><i>Wildlife, Cavity nester Habitat (4-262):</i> Strive to provide snag habitat at the levels shown in Table 4-39, while meeting the primary management emphasis for the specific management area, except where safety is involved (MA-13, 14, & 28). Per Table 4-39 “Snag Level by Management Area,” the snag level is 0%, the anticipated and predicted result of implementation of the primary prescription.</p>	

20. **Comment:** *On the Malheur National Forest, in contrast, the largest known Armillaria root rot area is now being excluded from logging (which was proposed in the past) and promoted as a Forest visitor destination, based on high quality science and scientific interest in the site. I personally met a family from Europe last summer who were traveling and camping in a recreational vehicle and looking for the Armillaria root rot area nearby as one of their recreational and science interest destinations.*

Consideration: The large, single genet of *Armillaria ostoyae* (syn. *A. solidipes*) is fascinating, but the situation at Walton Lake is different in a developed area with different organisms causing structural instability in trees. The Ochoco NF would not promote a laminated root rot-infested stand for tourism because that would be counter to science, policy, and common sense. Two alternatives are analyzed that would not treat laminated root rot-infested stand. Both alternatives would require the 35-acre area to be closed to the public because of safety concerns.

A 2008 publication from the Malheur National Forest that describes the site referred to in the comment, “The World’s Largest Living Organism, the Humongous Fungus,” clearly states in two

separate locations “*Since standing dead trees may fail at any time, avoid walking or standing near, or disturbing standing dead trees.*” The area referenced on the Malheur National Forest is not one with laminated root rot throughout a Developed Recreation Management Area, as is the case in Units 2, 3, and 4, and is not subject to the same kinds of management objectives and standards as the Ochoco National Forest’s Developed Recreation Management Area (see previous comment responses). It is worth stating once again that laminated root rot does not necessarily display any symptoms in a tree and a tree may fall over without warning even though it appears live and healthy (EA p. 2).

21. **Comment:** *The rest of the moist mixed conifer forest surrounding the Walton Lake Developed Recreation area and throughout the rest of the Ochoco National Forest also has scattered small root rot pockets similar to those within the Walton Lake area. Recreational visitors have used dispersed campsites in these areas and otherwise use moist mixed conifer forest for dispersed hunting, hiking, horseback riding, snowmobiling, ATV riding, wildlife and wildflower viewing and photography, and special events such as solar eclipse viewing. Felling of legitimate immediate hazard trees is considered sufficient by both the Forest Service and the public for providing safer conditions for the vast majority of recreational use on the Ochoco National Forest and other National Forests. This is also true for the vast majority of campgrounds and other developed recreation areas on the National Forests, including those on the Ochoco National Forest. (14)*

Consideration: This project is unique because it is in a Developed Recreation Management Area with an emphasis on public safety. The EA explains the management guidance and need for the proposal (pp. 1-6). See also response to comment #19.

22. **Comment:** *Hazard tree policy does not address bark beetle infestations and diffuse root diseases because it’s impossible to fully stop them and not ecologically desirable to do so. These are the forest’s natural methods of self-thinning, creating variable density openings and patchy density, and providing habitat niches for all the species that evolved with natural disturbances (but not with logging and tree plantations.) (14)*

Consideration: Hazard tree policy does not serve to guide management of forest health issues in recreation areas. However, in the *Field Guide for Hazard-Tree Identification and Mitigation on Developed Sites in Oregon and Washington Forests* (Filip et al. 2014), Chapter 1 includes the need for Vegetation-Management Planning and states on p. 11, “When removing hazard trees, we may need to consider and plan for replacement vegetation to achieve the desired future condition of the site and the associated vegetation.” Developed recreation areas need to periodically have forest health evaluations and at times, long-term planning efforts to address public safety concerns related to on-going hazard tree issues and underlying forest health conditions (Harvey and Hessburg 1992, Filip et al. 2014). Forests and vegetation in recreation areas are dynamic and change due to disturbances. Without a long-term approach, hazard trees may continue to be removed without planning for replacement of overstory trees without regeneration in mind or without considering forest diseases and insects that can impact public safety, management options, expectations, stand structure and fuel profiles. A primary objective of this project is to promote healthier forest stands by reducing forest insect and disease levels in the long-term related to public safety concerns. The management guidance from the Forest Plan is outlined on pages 4-7 of the EA and in Table C-2 above.

The EA describes how the stand would likely develop without treatment under No Action and Alternative 4 (see EA p. 38).

23. **Comment:** *There is the additional unanalyzed issue of substantial fines associated with closure violation (noted in very small print at the bottom of the Walton Lake Project sign at the entrance to the campground). Would these fines of \$1,000 for individual violation of the closure and \$10,000 for an organization’s violation of the closure still be enforced, and if so, why? Are there other reasons*

for these fines beyond deterrence to entry regarding public safety? Without full disclosure of realities within the closure and motivations for continuing the closure and whether or not the large fines would still be applied, the public is not fully informed. Due to this lack of disclosure, the public cannot submit fully informed comments on the revised EA regarding any concerns they may have about leaving the timber sale marked to cut, the logging of very large old growth firs within the closure area, the continuance of the closure to public entry, and the associated heavy fines for violation of the closure. Throughout chapters 1 and 2 and the Recreation section of Chapter 3 of the revised EA, I saw no disclosure of the issue of fines for public entry of the closure, only mention that the closures would stay in effect under all alternatives except for the Proposed Action alternative. (14)

The Forest Service could lift the public closure right now. There is no legal requirement or real necessity for a public closure. The warning signs posted warn of the hazard. Most people will never notice the ominous hefty fines for closure violation since they are in miniscule print at the bottom of the sign about the Walton Lake project and the root rot situation. This means that people are going into the closure area anyway. We have seen recreationists enter and exit the closure to use the Round Mountain hiking trail segment. (14)

We oppose the unnecessary public closure and the associated draconian fines. These are now being used as a form of black mail to force the acceptance of the proposed action. (14)

Consideration: The EA p. 13 states that closure of the infested area would be implemented through a Forest Order as is currently the case. The closure of an area has the effect of not allowing people to enter. In this case the effect is on the recreational experience and is disclosed in the EA p. 60. Forest Orders are issued under 36 CFR 261 Subpart B, Prohibitions in Areas Designated by Order. An order is the means by which entry into an area can be prohibited. Violating a prohibition such as this is considered a Class B Misdemeanor.

The analysis in the EA is based on the assumption that the recreating public would adhere to the closure to avoid the danger presented in the area. The Forest Service does not assume that the recreating public would violate closures and there have been no citations issued to date. This assumption is noted in the EA, p. 58.

24. Comment: *I haven't heard of any campgrounds or parks in the Pacific Northwest closed due to Laminated Root Rot. (14)*

Consideration: Many campgrounds in the Pacific Northwest have been closed because of forest health issues over the years. It is often because of the presence of hazard trees or a known disease that prevents the area from opening until hazards can be mitigated. The decision to be made in the Walton Lake project is not dependent on whether or not similar actions have been taken elsewhere. The Forest Service has developed a proposed action that is unique and specific to the Walton Lake project area, the current conditions, and the Forest Plan goals and objectives. Nevertheless, the following are some examples of recreation area closures in the Pacific Northwest:

- The Mount Hood National Forest closed the Indian Henry Campground except for a disease-free portion, due to forest health problems. The presence of laminated root rot and other decays were found to be a significant safety concern. Much of the campground remains closed because the presence of critical habitat for northern spotted owl prevents full treatment of the site. In contrast, the Walton Lake Developed Recreation Area does not provide habitat for any species listed as threatened or endangered.
https://www.oregonlive.com/clackamascounty/2011/07/hazardous_trees_cause_closure.html
- Herman Creek Campground/Horse Camp in the Columbia River Gorge National Scenic Area closed as a result of the presence of hazard trees infected with laminated root rot being

identified that posed a significant risk to public safety:

<https://www.fs.usda.gov/detail/crgnsa/news-events/?cid=STELPRD3795947>

- East Kachess Group Site closed due to laminated root rot being found throughout the site near Kachess Lake on Cle Elum Ranger District, Okanogan-Wenatchee NF:
<https://www.fs.usda.gov/recarea/okawen/recreation/recarea/?recid=57489&actid=33>
- Lake Wenatchee State Park in Washington partially closed due to laminated root rot presence: https://www.wenatchee-world.com/news/local/root-rot-takes-down-sick-firs-and-their-healthy-looking/article_dd0217d0-c2ec-54fe-8a21-f98a6071eb51.html
- Kopachuck State Park in Washington considered options to address forest pathogens and public safety issues and decided to fall 900 trees:
<http://www.foxislandwa.net/documents/StewardshipBriefForestHealthKopachuck.pdf>
<https://patch.com/washington/gigharbor/kopachuck-to-lose-900-trees-in-root-rot-solution>
- Laminated root rot infested trees in Mima Falls Campground removed prior to opening:
<https://washingtondnr.wordpress.com/2010/12/17/root-rot-fungus-infects-conifers-in-capitol-state-forest-campground/>
- Trees removed from Cascadia State Park due to laminated root rot:
http://www.oregontraveldaily.com/news/sparks040510_446.php

25. **Comment:** *There is only one sentence in the inadequate cumulative effects analysis for alternatives 3 and 4 regarding the public closure, which wields the closure as a threat if the proposed alternative is not chosen and does not disclose the fines for violation of the closure or the already fully marked timber sale within the closure: “A public closure that would remain indefinitely is in contrast for the access and enjoyment of recreation within its boundary.” (14)*

Consideration: The EA notes that there are no other closures or activities in the area that would create a cumulative effect on the recreation experience. The exterior boundary of the area is flagged, but there are not any marked trees within the area currently under closure (Units 2, 3, and 4). The closure does conflict with the management emphasis of the Developed Recreation Management allocation. Also see response to comment #23.

ENVIRONMENTAL EFFECTS ANALYSIS—LAMINATED ROOT ROT

26. **Comments:** *The proposed actions involving heavy logging to reduce root rot are inconsistent with the purpose and need to increase public safety and maintain a natural outdoor setting for recreation. Credible, abundant scientific research clearly concludes that commercial logging will not address perceived root rot issues, as such processes are natural and essential components of the forest. Furthermore, the resulting logging would be an unnatural repugnant clearcut in an otherwise beautifully treasured recreation area. (1, 9)*

I am worried that the proposed action regarding heavy logging to reduce root rot is inconsistent with the purpose and need to increase public safety and maintain a natural outdoor setting for recreation. Logging will not address perceived root rot issues, and the resulting logging would be an unnatural and unseemly clearcut. (6)

A controversy exists because treating LRR with heavy logging is likely to be counterproductive. A controversy exists where “a substantial dispute exists as to the size, nature, or effect of the major federal action rather than to the existence of opposition to a use.” Here the effects are substantially disputed. Logging will not treat LRR it will spread it. Chad Hanson contests the project’s effects and stated that logging would increase occurrence of LRR rather than reduce it. Pine trees may be infected when growing mixed with more susceptible conifer, citing Hansen and Goheen 2000.

Consideration: The project incorporates design features to minimize the immediate visual impact, and reforestation will improve the visual quality over time. It is expected to have a natural forested appearance within 10 years. The Forest Service acknowledges that laminated root rot is caused by a native fungus that plays many important ecological roles, but the EA points out that such a pathogen is not consistent with providing a safe environment in a recreation setting. EA p. 2, 58. Root diseases contribute to structural diversity (creating canopy gaps, snags and down wood; Van Der Kamp 1991, Hansen and Goheen 2000) and play important ecological functions, but in developed recreation management areas, the desired condition typically includes fewer structurally unstable trees and more healthy, vigorous trees that are less likely to fail to provide safe public access (Harvey and Hessburg 1992, Filip et al. 2014). The proposed action does not include “logging” by itself in Units 2, 3, and 4, but includes planting immune, resistant and tolerant tree species to reduce the adverse effects associated with the accumulation of structurally unstable, dead and dying trees with decayed roots in stands infested with laminated root rot. The research related to treatment of stands with laminated root rot has been reviewed and removing highly susceptible host tree species, like grand fir and Douglas-fir, and replanting the site with immune, resistant or tolerant tree species is a common strategy to reduce the adverse effects associated with this root rot which causes structural instability in trees. For example, Oester et al. (2018, pg. 75) state, **“In many cases, laminated root rot can be managed by favoring several resistant or tolerant tree species when planting or thinning to discriminate against the highly susceptible Douglas-fir and true firs...”** in Oregon State University Extension Service’s *Managing Insects and Diseases of Oregon Conifers*. In scientific literature submitted by Dr. Chad Hanson the commenter mentioned, Sturrock et al. (2006) in British Columbia noted on p. 42, “Treatment strategies are usually based on inoculum reduction (e.g., removal of stumps) or **the selection of other less-susceptible species for regeneration...When inoculum removal is not an option, consider species that are immune or have lower susceptibility. This may mean planting less productive species for a rotation on an infected site.**”

27. **Comment:** *The timber sale is being conducted under the premise of addressing public safety by removing trees affected by root disease. But in fact, for most of the trees being logged, this will not be true, since the approach is to remove ALL trees in the 35-acre cutting areas (AKA clear-cutting). The expressed rationale to the sale is to log entire species, if they are "susceptible" to root disease. (15)*

Consideration: The prescription for the sanitation harvest is clearly described in the EA page 20. All of the trees that are highly susceptible to the disease will be removed. The extent of the infestation has been documented based on in-depth field surveys (USDA Forest Service 2019). Trees of species not highly susceptible to the disease such as hardwoods, ponderosa pine and western larch will be retained. The proposed action also includes regenerating areas with tolerant, resistant or immune tree species (Edmonds et al. 2000, Thies and Sturrock 1995, WA State Academy of Sciences 2013, Lockman and Kearns 2016, B.C. Ministry 2018, Oester et al. 2018). It will address an ongoing public safety issue and promote the development of a healthy forest stand by removing diseased and susceptible trees and replanting with resistant or tolerant ponderosa pine, western larch and a variety of hardwood species.

28. **Comment:** *The revised Environmental Assessment for the Walton Lake project still fails to disclose scientific controversy over the efficacy of standard methods of commercial logging to reduce root rot. This is despite the fact that Ochoco Forest staff members showed a slideshow at a past Ochoco Collaborative group meeting (which I attended) that revealed the environmental impacts and uncertain effectiveness of a Canadian experiment that clearcut a root rot affected area and removed all the stumps and tried to remove all the root systems to clear the soil of root rot fungus. The Forest Service staff conclusion at the presentation was that this was a very expensive procedure with obvious severe environmental impacts. Further there was not yet any evidence from this experiment that proved that root rot could be removed from the soil enough to prevent future root rot infestation*

in the same site. This presentation by Ochoco Forest staff did not encourage the use of clearcutting and trying to pull out all stumps and root systems, which high quality science not being used by the Forest Service finds would be necessary to try to free the affected area from root rot. (14)

Consideration: The removal of trees that are highly susceptible (grand fir and Douglas-fir) to laminated root rot followed by planting of immune, resistant or tolerant tree species is a common management approach to reduce the adverse effects of structurally unstable, dead and dying trees from occurring on a site with laminated root rot (Thies and Sturrock 1995, Tainter and Baker 1996, Edmonds et al. 2000, WA State Academy of Sciences 2013, Lockman and Kearns 2016, B.C. Ministry 2018, Oester et al. 2018). Planting with less susceptible tree species following harvest is a consistent management strategy to reduce adverse effects of laminated root rot on a site with highly susceptible tree species present where the disease occurs and is a strategy recommended throughout the scientific literature including the additional references: Hadfield et al. 1986, Hansen and Goheen 2000 (p. 533) and the article by Sturrock et al. 2006 submitted by Dr. Chad Hanson that the commenter mentioned. After analysis of stump removal, because of the soil disturbance created as a result of that treatment option and the high cost of removing stumps, stump removal was not considered a feasible treatment option. The proposed action includes planting with tree species that are immune, resistant or tolerant of laminated root rot and the objective is not to completely eliminate the pathogen causing disease on-site, but to reduce the adverse effects associated with the current abundance of unstable trees with decayed root systems posing an ongoing threat to public safety.

29. **Comments:** *The proposed actions in sale units 2, 3, and 4 (the root rot area) are inconsistent with the stated “need” to “curb” the laminated root rot infestation, as logging and ground disturbance will spread the root rot. The root rot will not be significantly reduced since there is no plan to remove stumps and root systems and soil already infected with root rot. Further, the planned artificial tree species conversion to timber industry-preferred Ponderosa pine and Western larch to eliminate fir “host” trees susceptible to root rot is not likely to be successful. (14)*

Not disclosed or analyzed in the Revised EA are multiple problems with the proposal to convert the existing mature and old growth moist mixed conifer stand to a virtually clearcut re-planted dry conifer stand: First, this is a naturally moist mixed conifer stand due to geological, hydrological, and topographic conditions that will not be changed. This moist mixed conifer stand is situated on a North aspect slope facing the rising moisture from Walton Lake and near tributary streams and seasonally wet areas. The soils are largely ashy, which contributes to moisture retention. Fir will inevitably grow back into the stand and the Ponderosa pine may not do very well, as this is an inappropriate site for Ponderosa pine except on the drier edges and ridgeline where they already exist. Likewise, the drier mixed conifer area has South and West aspect slopes and more clay soil. However it is evident that the drier mixed conifer also has historic old growth Douglas fir (and some large old growth fir stumps), so logging of large firs is not warranted. (14)

Fir species seed source is already in the soil and would likely remain in the soil after all the clearcutting and replanting, providing for laminated root disease host tree species to grow back into the area. (14)

Commercial logging (and leaving stumps and root systems of the fir “host” tree species logged in the ground) will not prevent firs from growing back. (14)

Consideration: Based on analysis, the proposed treatment is designed to reduce the adverse effects associated with structurally unstable trees currently infected with laminated root rot or the highly susceptible grand fir and Douglas-fir that can become infected into the future rather than eliminate the pathogen from the site in Units 2, 3 and 4. Also, ponderosa pine, western larch and hardwoods are already present at varying levels in these stands and are expected to grow well on this productive site after being planted in openings. There was no evidence during analysis that the

proposed actions would exacerbate adverse effects associated with the current abundance of structurally unstable grand fir and Douglas-fir with laminated root rot or those that could become infected by the root rot in these stands. Oester et al. (2018, p. 75) state, “In many cases, laminated root rot can be managed by favoring several resistant or tolerant tree species when planting or thinning to discriminate against the highly susceptible Douglas-fir and true firs...” in Oregon State University Extension Service’s *Managing Insects and Diseases of Oregon Conifers*. Edmonds et al. (2000, p. 298) also mention, “Using resistant conifers or immune species in root rot centers is a viable management technique for many root diseases...”

Planting would consist of using seedling stock obtained from local seed zones so that the planted seedlings would be adapted to the site. Seedling survival would be monitored for first and third year survival rates and replanting would occur if seedling survival is not satisfactory. Based on observations of plantations in the local vicinity on similar aspects and soils, it is expected that seedling survival and growth will be successful. Both ponderosa pine and western larch are considered early seral species on moist grand fir sites and frequently regenerate naturally following stand-replacing wildfire. Since both species are shade intolerant, they grow well under open conditions with few overtopping trees. The units occur in productive volcanic ash soils which also enhance seedling survival and growth. Regeneration will also be monitored, including species composition. Vegetation management such as thinning could occur in the future if necessary to continue the promotion a healthy forest stand; it’s unknown when or what exactly might be needed and any future management would be subject to NEPA procedures.

30. **Comments:** *Science that found that logging actually spread root rot was submitted to the Ochoco Forest Service staff by Dr. Chad Hanson, Ph. D. as part of his comments during earlier comment periods for the Walton Lake project and we referenced this high quality science in our Blue Mountains Biodiversity Project comments on the Walton Lake Project. However the Revised EA for Walton Lake still fails to disclose and analyze this science that refutes the efficacy of the planned clearcut-intensity “Sanitation Harvest” that would leave stumps and root systems infected with root rot in place. (14)*

The full range of high quality science does not dictate the need or efficacy of removing all host tree species in order to “address” root rot. This is actually a novel strategy that has not necessarily proven itself. The proposed action would not include removing all the root rot-affected stumps, root systems, and soil, so it would likely spread root rot through the soil rather than reducing its incidence. (140)

Consideration: There was no evidence during analysis that the proposed actions would exacerbate adverse effects associated with the current abundance of structurally unstable grand fir and Douglas-fir with laminated root rot, or those that could become infected by the root rot in these stands after shifting species composition toward a less susceptible tree species mix. The previous comments from Dr. Chad Hanson were considered and he cited Hansen and Goheen (2000) that was also considered and cited in the EA; and he cited Bloomberg (1988) and Sturrock et al. (2006) in comments regarding root rot. Consistent with the proposed action, Hansen and Goheen (2000, p. 533) suggested in another designated management area of Late Successional Reserves “...planting root disease-resistant species should be considered in openings;...Managers should consider planting root disease-resistant species in openings if susceptible hosts make up a high proportion of the stand and a high degree of canopy closure is desired.” This article did not consider laminated root rot in the context of developed recreation management areas where public safety is a concern however. Bloomberg 1988 showed the increase in Douglas-fir mortality in areas infested with laminated root rot over time from field plots and modeled spread in western Oregon and southwestern British Columbia, which is expected under no action in Units 2, 3 and 4. This study did not include field plots or modeled spread and mortality rates where less susceptible species were planted following harvest. Sturrock et al. (2006) provided silvicultural considerations for

managing adverse effects associated with laminated root rot in British Columbia. The proposed action includes planting less susceptible species on-site following harvest, which is consistent with Sturrock et al. (2006) noting on p. 42, “Treatment strategies are usually based on inoculum reduction (e.g., removal of stumps) **or the selection of other less-susceptible species for regeneration...When inoculum removal is not an option, consider species that are immune or have lower susceptibility. This may mean planting less productive species for a rotation on an infected site.**” In the book Forest Health and Protection (2000) by University of Washington professors Edmonds, Agee and Gara, in the ROOT DISEASE MANAGEMENT section of Chapter 12, p. 298-299, under **Use of Resistant Species**, the professors noted, “Use of resistant conifers or immune species in root rot centers is a viable management technique for many root diseases,...To manage the fir strain of the laminated root rot fungus, an immune hardwood species such as red alder could be planted in Douglas-fir infection centers.” As professors Tainter and Baker (1996; p. 417-418) pointed out under *Control Strategy for Laminated Root Rot* in the book Principles of Forest Pathology, “If preceding treatments are not feasible, then a more resistant species could be planted in an area 30 m beyond known diseased trees. Douglas-fir should not be planted within 30 m of an infested stump. The purpose of planting resistant tree species on *P. weirii*-infested sites is to reduce inoculum to acceptable limits...”

31. **Comment:** *The Revised EA does not use detailed analysis to disclose the benefits of letting the natural disturbance functions of laminated root rot take place, based on high quality science, such as naturally thinning the forest, providing snags and down logs for wildlife foraging, and contributing carbon and other nutrients to the soil, as well as providing for long-term storage of carbon in the resulting snags, logs, and soil enrichment, which helps reduce the effects of extreme climate change. Such analysis is needed both to provide unbiased analysis of environmental impacts and to prompt the needed disclosure of negative impacts of planned logging to all these ecological benefits derived from root rot natural disturbance of the forest. Fir snags and logs are especially valuable to Pileated woodpeckers and Black bears for foraging for insects because they are soft, decay rapidly, and are a more reliable and readily replenished source of soft snag and log foraging due to firs' susceptibility to root rot and other diseases. (14)*

Consideration: Root diseases contribute to structural diversity (creating canopy gaps, snags and down wood; Van Der Kamp 1991, Hansen and Goheen 2000, Washington State Academy of Sciences 2013) and play important ecological roles as mentioned, but in developed recreation management areas, the desired condition includes fewer structurally unstable trees and more healthy, vigorous trees that are less likely to fail to provide safe public access (Harvey and Hessburg 1992, Filip et al. 2014). Some down logs are proposed to be left in treatment units and laminated root rot centers adjacent to the project area also contain the important habitat features mentioned based on field confirmations just outside the developed recreation management area.

32. **Comment:** *The reality is that laminated root disease has likely always (for millennia) been in the moist mixed conifer forest, which includes within the Walton Lake area as well as the moist mixed conifer forest across the rest of the Ochoco National Forest. Removing large old trees, as planned for sale units 2, 3, and 4 would remove trees “particularly important to the character of the site.” (14)*

Consideration: The EA acknowledges that laminated root disease has likely been in the area for a long time (at least centuries given the size of canopy gaps observed associated with disease centers and the known rate of spread by the pathogen (Thies and Sturrock 1995, Washington State Academy of Sciences 2013)). Large old trees of less susceptible species such as ponderosa pine and western larch along with hardwoods are to be retained, which according to the Forest Plan, are important components of the visual quality of recreation sites on the Ochoco National Forest. Some smaller ponderosa pine, western larch and hardwoods are to be retained as well.

33. **Comment:** *There is a small type footnote on the Revised EA p. 13 describing “sanitation harvest.” This definition identifying “Sanitation Harvest” as clearcutting still does not appear in the main body of the EA—at least not in Chapters 1 and 2, where alternatives and associated management actions are described. (14)*

The treatment method is labelled “Sanitation harvest” to falsely, and corruptly, imply this action will remove the disease for any length of time. (15)

Consideration: Sanitation harvest is the proper silvicultural term for the prescriptions proposed in Units 2, 3, and 4; it is clearly described in the EA p. 21 and footnote p. 14. There is no intent to completely remove the pathogen, rather the intent is to promote a healthier stand of trees that are much less susceptible to damage from root and stem decays found on-site (EA pp. 4, 21).

The footnote does not define sanitation harvest as clearcutting. It clearly defines it as a type of regeneration harvest. There are hardwoods, western larch and ponderosa pine to be retained in Units 2, 3, and 4 (see Figure 17 for mapped large trees to be retained). The footnote was included in order to prevent potential confusion. The prescription for Units 2, 3, and 4 is described in more detail in the EA on page 20.

34. **Comment:** *A “root disease climax community” is a natural potential (but not inevitable) successional state, not a terrible or unnatural situation. The Forest Service is planning to bring about a worse condition in sale units 2, 3, and 4 by unnaturally clearcutting and artificially replanting only timber industry preferred tree species. (14)*

Consideration: The Forest Service does not view a root disease climax community as unnatural or terrible; however, the purpose and need for action is based on the recreational quality of the area. The project area is not a timber-producing management allocation; the Forest Plan directs us to emphasize maintenance of large ponderosa pine and western larch in the visual influence area. The existing large ponderosa pine and western larch (about 3 per acre) will be retained and the removal of grand fir and Douglas-fir around them will improve the health of ponderosa pine and larch and increase the chances of their survival into the future.

35. **Comment:** *The failure of the Revised EA to disclose and consider the high quality science presented by Chad Hanson, Ph. D. in comments submitted during earlier comment periods on the Walton Lake sale and referenced in Blue Mountains Biodiversity Project comments (confirming that logging is known to spread root rot) enables the Forest Service to preclude other more logical and reasonable alternatives for addressing the root rot issue.*

Consideration: There is no evidence that the proposed treatments would exacerbate laminated and treatments would reduce the adverse effects of an abundance of structurally unstable grand fir and Douglas-fir with decayed roots on-site, thus improve public safety. The information provided by Chad Hanson in 2015 was reviewed and considered, see response to #26, #28, and #30.

EXISTING CONDITION – FORESTED VEGETATION

36. **Comment:** *Grand fir is not “young” up to 21” dbh, as characterized in the Revised EA, but is likely at least mature and mostly 80 to 100 years old, based on the coring of Grand firs not much greater than 21” dbh in the Wolf timber sale on the Ochoco National Forest which were mostly 100 to 130+ years old. (14)*

Consideration: There are trees of varying ages in the project area. The description of activities notes that commercial thinning would retain live old trees (> 150 years) following the Van Pelt Guidelines. EA pp. 20-21. This has been reinforced by adding it to the Resource Protect Measures section of the EA, p. 28.

37. **Comment:** *The stands in sale units 1 and 5 were already non-commercially thinned only 10 years ago (Revised EA p. 33) and really don't look unnaturally dense. Sale unit 1 also has a lot of evidence of past hazard tree removal, as noted in the Revised EA, p. 33. The perceived "need" for commercial thinning and even for non-commercial small tree thinning in sale units 1 and 5 is dubious at best. (14)*

The EA statement about replacement of patches of trees, individual trees, and openings with dense continuous stands of trees is simply not true on the ground in the drier mixed conifer commercial thinning sale units. These stands are highly variable, with large and small openings, patches of trees, and individual large trees. (14)

Small tree thinning done by hand and prescribed burning only in the dry mixed conifer area should be enough to address any Forest Service anxiety about wildfire risk and tree competition, given that there is not really any excess density of mature and large trees. (14)

The drier mixed conifer sale unit areas are not that dry. Within sale unit 1 there is a prominent stream drainage, a boggy area, a landslide slump area, all within the "dry" mixed conifer area, which has a relatively moist Grand fir plant association. Unit 5 is adjacent to a riparian drainage and faces the lake. These sale units are drier than the moist mixed conifer area slated for virtual clearcutting but sale unit 1 in particular still has a good mix of tree species reflecting the moister slope aspects, drainages, proximity to water, and ashy soil occurrence. (14)

Consideration: The EA acknowledges that existing tree stocking is variable and allowances have been made to retain patches of denser trees for reasons such as visual screening around campsites. Though some of the project area may not appear to be overly dense to visitors, the Forest Service uses the stand density index, developed by scientists in central Oregon, to determine when stands are above a threshold where bark beetle attack could cause serious loss of overstory trees. Some portions of the project area are above that threshold (the upper management zone). EA p. 39. The EA also acknowledges the wide variety of conditions, including meadow fringes and wetlands. EA p. 42. The project is designed to protect sensitive resources such as riparian areas. EA pp. 21, 24-26.

38. **Comment:** *Past commercial removal of overstory mature and large trees, including hazard tree logging, contributed greatly to the in-growth of young dense fir in sale units 2, 3, and 4, where this logging occurred. This is an important disclosure for the EA to include, since the rationale for further logging of mature and large trees up to clearcutting intensity is partially based on the EA's claim that the dense younger firs are from wild fire suppression, with no mention of the effects of past logging contributing to this condition. (14)*

The moist mixed conifer area, as stated above, would naturally and historically be denser, but now has more dense continuous stands of trees where the overstory was logged out in the past, not so much where the existing old growth and large firs now exist and not in the small clearings created by the root disease. (14)

The planned virtual clearcutting would move the moist mixed conifer forest away from its historic condition. (14)

Consideration: Logging and mining occurred in the area until it became a recreation site in the 1950s. Fire suppression has contributed greatly to the existing condition of these stands and is responsible for the presence of dense young fir. However, the EA does not suggest that wildfire suppression is a rationale for treating in these units; the purpose for treating in these units is to follow Forest Plan guidance to address diseases in this management allocation and to develop a healthy stand of trees to provide safe public access.

The Forest Health report notes that:

Past harvest of economically valuable species such as ponderosa pine and western larch, in addition to fire exclusion, have had significant ecological impacts in mixed conifer and pine forests east of the Cascade Mountains where *Armillaria ostoyae* and *Heterobasidion* spp. join *P. sulphurascens* in shaping forest structure (Hansen and Goheen 2000). The species composition of these forests has been dramatically shifted from early seral pines and western larch to mid- and late-seral Douglas-fir and *Abies* species. Since the latter tree species are generally more susceptible to all three root pathogens, the result has been a general increase in root rot incidence and impact. For example, even in mixed conifer stands in units 2-4, large, legacy ponderosa pine and western larch >20" dbh are found scattered throughout these stands with an abundance of grand fir that regenerated under them following fire exclusion.

ENVIRONMENTAL EFFECTS ANALYSIS – FORESTED VEGETATION

39. **Comment:** *The project is a "type conversion" which is significant cumulative effect. (14)*

Consideration: It is not clear what the commenter means by "type conversion." See responses above regarding the changes from historic conditions. The effects as disclosed in the EA for the 35 acres of sanitation harvest are minor on the landscape and meet the objectives for the Developed Recreation Management Area.

40. **Comment:** *Ponderosa pine plantations in clearcuts in the midst of moist mixed conifer forest are often sickly, readily subject to bark beetle infestations, and visually starkly out of place. This is my experience through field surveying in natural moist mixed conifer forest and finding artificially converted pine plantations planted on clearcuts there on the Umatilla and Malheur National Forests. The practice of converting natural moist mixed conifer forest to pine and larch plantations through clearcutting and replanting is grossly outdated. The Forest Service elsewhere is now focusing on diversifying even age sickly Ponderosa pine plantations in the midst of moist mixed conifer forests, such as with the Glass timber sale on the Umatilla National Forest. (14)*

Consideration: Information on expected survival of seedlings has been added to the EA. The area to be planted with ponderosa pine and western larch seedlings already has these species and hardwoods present. More grand fir are present now than historically due to fire exclusion.

41. **Comment:** *Obviously 50 trees \geq 21" dbh do not have to be removed over the two commercial thinning sale units (1 and 5) for density reduction when commercial thinning is estimated to remove 1,770 trees. (14)*

1,770 is an astoundingly high number of trees to remove from only 43 acres; this would not look like just a "commercial thin" at all. The sites would be wide open and look completely altered, with no natural forest appeal or sense of place for those visitors who had seen the areas before the logging. Sense of place is also a landscape character value that the Management Area designation seeks to preserve. Density is already variable across sale units 1 and 5, which both have both small and large openings. We are opposed to the proposed "commercial thinning" in sale units 1 and 5 as unnecessary and ecologically and recreationally destructive. (14)

Consideration: The overall number of trees to be removed is based on reducing the basal area to below the upper management zone (UMZ). See EA p. 39 for definition of UMZ. Approximately 50 young grand fir or Douglas-fir trees 21" dbh and larger are being removed that are within close proximity of old ponderosa pine. They are being removed to increase the resiliency of individual old ponderosa pine. See EA p. 39.

ENVIRONMENTAL EFFECTS ANALYSIS – OLD GROWTH, LARGE TREES, LATE AND OLD STRUCTURE

42. **Comment:** *In this unwarranted project, the Forest Service egregiously proposes the ecologically devastating logging of large mature and old growth trees; clearcutting (called “Sanitation Harvest” for this sale); logging of popular recreation sites; and use of Forest Plan amendments to enable violations of Forest Plan standards and guidelines that serve to protect wildlife habitat and recreational values. (1)*

I do not support the logging of old growth trees at Waldo Lake, or in any other area of our public lands. Old growth is too rare and is of much greater value left standing. (4)

I respectfully oppose the proposed logging of Walton Lake’s old growth forest. (6)

Citizens of the state both urban and rural understand the need to preserve mature forest for reasons including; 1. Mitigation of climate change. 2. Wildlife habitat. 3. Recreation economic advantage to communities. 4. Big trees hold water and retard forest fire destruction...forest fire such as in Australia and Brazil can pollute much of the Oregon air shed. (8)

Consideration: Please refer to the effects analysis for Large Trees, and Late and Old Structure (LOS) in the EA pp. 44-49. The effects are assessed at the project level, and cumulative effects are assessed at the watershed and Forest level. At the project level, LOS is maintained and the risk to loss of large trees improved in thinning units. In laminated root rot units, the removal of fir trees would reduce LOS by 35 acres under Alternative 2, 14 acres under Alternative 3, and 0 acres under Alternative 4. The cumulative effects analysis shows that 35 acres is an insignificant effect within a watershed that is already above the Historic Range of Variability (HRV) for multi-strata LOS.

43. **Comments:** *The improvement of “survivability of large trees into the future” is not attained by logging existing large trees and mature trees that would otherwise grow into large trees. This is an obvious conflict between the proposed actions and Forest Plan goals. (14)*

Consideration: Reducing stand density to below the upper management zone reduces competitive stress on and the susceptibility of large pines to attack by bark beetles and increases their longevity on the landscape. EA p. 39.

44. **Comment:** *Logging all root rot host trees, including those over 21” dbh, would also involve logging old growth Grand fir and Douglas fir (which are not specifically protected in sale units 2, 3, and 4) and more fire-resistant large fir trees, including Douglas fir, which is more fire resistant than Grand fir. Nothing has changed since the Eastside Screens were enacted in 1995 except a lot more logging, as well as wildfires. There is still a big regional deficit in large trees and needed large tree structure across Eastern Oregon and the Ochoco National Forest due to past over-logging of large and old trees and continued incremental reduction in large trees through hazard tree felling and other large tree logging that was not stopped. (14)*

Reducing stress on ponderosa pine is similar to other projects in eastern Oregon and therefore contributes to a significant cumulative loss of large trees and old growth forest over time.

The Walton Lake sale proposed action would remove 521 fir trees larger than or equal to 21” dbh from sale units 2, 3, and 4. This is a huge and shocking planned elimination of large and old growth firs from such a small area as 35 acres. This high abundance of large and old growth fir points to the significance of this area for wildlife and recreational enjoyment. (14)

Apparently all the snags would be removed, as well as most logs, so habitat for old growth, large tree, and density-associated wild life species would be eliminated throughout the 35 acres. (14)

Consideration: The number of trees to be removed is due to removing all of the highly susceptible, dying fir trees. Some large older fir trees would remain in a few small leave areas and all ponderosa pine and western larch trees will remain (shown in EA Figure 17). The stand is not a significant area for wildlife (refer to wildlife section), and is not available for recreational enjoyment in its current condition.

The analysis for large tree abundance shows that on the Ochoco National Forest, the effect to large tree abundance from treating units 2, 3, and 4 would be negligible as there are approximately 3.3 million large trees on the Forest. Additionally, down wood will be retained for wildlife habitat purposes.

45. **Comment:** *Why are the required LOS numbers of large trees per acre set so high compared to other Forests? For the Malheur National Forest, stands are considered LOS if they have 10 large trees per acre. This policy of 15 to 20 large trees per acre being required leaves stands with fewer large trees per acre out of consideration in analysis and for future or current old growth development. This encourages more large tree structure to be logged despite the large regional deficit in large trees due to past over logging and current continued incremental reductions, as proposed in the Walton Lake sale and unfortunately executed in the Wolf sale on the Ochoco. (14)*

Consideration: LOS is defined in the Screens as stands where “large trees are common.” On the Ochoco National Forest, the number of large trees per acre required to be considered common varies by plant association group and associated site productivity. It ranges from a low of 10 large trees per acre in the dry ponderosa pine group up to 20 large trees per acre in the much more productive moist grand fir group. Regardless of the number of large trees present, the Ochoco National Forest is generally managing stands towards historic conditions which includes increasing the abundance of LOS and maintaining species compositions that occurred historically. The purpose of the Walton Lake project however is focused on public safety and maintaining large old ponderosa pine for aesthetic qualities within a developed recreation management area and not maintaining or increasing the abundance of LOS.

46. **Comment:** *Compared to historic (pre-European) conditions, the headwaters Ochoco Creek watershed definitely does have a deficit of LOS, as much of the area (including the Canyon sale area, which we field surveyed) has been converted into even-age younger-mature Ponderosa pine plantations. We are referring to that deficit in large trees, the historical obvious deficit from past extensive logging of large trees and old growth forest, not modeling of theoretical HRV for different forest types of LOS.*

Consideration: HRV analysis presents the range of conditions that occurred prior to historic logging practices and suppression of wildfire (cite). It is used to demonstrate the amount of departure in current conditions. For the Ochoco Creek watershed, though large trees have been reduced, the multi-strata LOS is above the historic range of variability (HRV) and would remain there under any alternative--there is more multi-strata LOS in the watershed than would have occurred under a natural disturbance regime. The EA does note that single-strata LOS in both moist and grand fir PAGs is below HRV at the watershed scale; single-strata LOS is not present in the project area and would not be affected.

47. **Comment:** *The Walton Lake logging under alternatives 2 and 3 would definitely contribute negative impacts to the overall loss of large tree structure and old growth forest on the District, the Ochoco National Forest, and the region.*

The time frame for cumulative effects to LOS on the Forest scale starting at 1995 (when the Eastside Screens went into effect) is very convenient for failing to disclose all the prior timber sales on the Forest that eliminated large trees (LOS) and old growth through logging. (14)

Consideration: The EA discloses the impacts to LOS from each alternative on pp. 45-47. The current condition of LOS takes into account all previous forest management that affected stand structure. Forest Service NEPA regulations do not require an analysis of all past projects that led to the existing condition. Including all past actions that led to the current condition would not change the conclusions about the amount of LOS on the landscape compared to the HRV. The timeframe for the cumulative effects analysis was chosen because the stated issue in public comments was the

accumulation of amendments to the Eastside Screens. The measurement therefore is the number of amendments and how many acres of LOS or large trees were affected.

48. **Comment:** *Considering that only one other timber sale removed large trees greater than or equal to 21" dbh (since 1995, through Forest Plan amendment, over our protests), at 384-768 large trees removed (shouldn't the Forest Service know how many?), the additional removal of 571 large trees through the Walton Lake timber grab is a significant increase in the loss of large tree structure. This is especially true considering the small acreage involved at Walton Lake, which intensifies the effects of the loss for scenic and recreational values in the relatively secluded lake area. (14)*

If the 571 large trees are logged it will change the landscape, and ecosystem of this area drastically. (20)

Consideration: Effects to Scenery and recreation are disclosed in the EA (pp. 56-73). Cumulative effects of large tree removal on the Forest from treating units 2, 3, and 4 would be negligible as there are approximately 3.3 million large trees on the Forest.

49. **Comment:** *Modeling results given in the silvicultural Report indicate that units 1 and 5 would continue to meet the criteria for LOS after harvest and commercial thinning. (Silv. Report at 12; Figure 2 at 7). However, the EA provides for commercial thinning in those units in addition to harvesting and noncommercial thinning. EA at 19. Therefore, the proposed activity in these units has not been fully evaluated as to whether it would continue to meet the criteria for LOS following commercial thinning. (14)*

Consideration: The silvicultural report and EA state "...after harvest and noncommercial thinning, units 1 and 5 would continue to meet the criteria for LOS...." The word "harvest" is referring to the commercial thinning. The FVS modeling accounts for both commercial and non-commercial thinning.

ENVIRONMENTAL EFFECTS ANALYSIS – WILDLIFE AND FISHERIES

50. **Comment:** *Flush cutting stumps for scenic purposes conflicts with wildlife goals. Consider high cutting some stumps to create "short snags" that increase the chances that recreationists get to view and enjoy snag associated wildlife. (17)*

Consideration: Lower stumps are required within proximity to roads, trails, campsites and other recreation improvements (see EA p. 27). The Forest Service has considered this suggestion for creating short snags on the outside of the loop road. Short snags could create wildlife foraging habitat for species that forage on dead wood material by strategically leaving short snags at various densities in the different proposed treatment types. This action may promote wildlife viewing opportunities and increase the project area's foraging habitat in the short- to mid-term while the restocked stand matures. Details of how this would be implemented would depend on the alternative selected and be based on the feasibility in each area.

51. **Comment:** *The analysis of effects to cavity species is misleading. It says "any loss would be expected to be minimal because snags are not targeted for removal." Whether snags are targeted is of minor consequence compared to the loss of green trees that are no longer available for snag recruitment as a result of logging.*

The analysis also says "trees retained in thinned stands would be expected to stay healthy longer, and thus will not provide snags in the short- to mid-term, reducing future snag and down wood recruitment." This admits some adverse effects on snag habitat, but importantly also fails to capture the most significant effect that logging reduces the population of green trees available for snag recruitment. The description of Alt 4 does not disclose that it would be better for snag associated wildlife because it retains a larger population of large green trees for snag recruitment. (17)

Consideration: The project area is not a good area to provide habitat for snag-dependent wildlife because dead trees conflict with the management area objectives. The Forest Plan does not require snag habitat be provided in Developed Recreation Management Areas.

The effects analysis has been updated to clarify the slight difference in snag habitat that would be available between the alternatives.

52. **Comment:** *The EA tries to minimize effects to snag associated wildlife by saying that snags are generally not retained in recreation areas, but a lot of the large trees to be removed under Alt 2 (or retained under Alt 1 and 4) are not so close to developed sites that they will need to be felled for safety. (17)*

Consideration: The EA does disclose how many trees > 21" dbh would be removed under Alternative 2. Some would be removed during the thinning treatment, which helps to maintain the large ponderosa pine tree structure, and others removed with the sanitation harvest where large ponderosa and western larch would be retained. There are some retention areas delineated out of Units 2, 3, and 4 in order to protect sensitive riparian areas; snags will occur in these areas which area away from the roads, trails, and other infrastructure; additionally, snags are not treated outside of the Developed Recreation Management Area except along the Highway.

The Forest Plan already considered that a Developed Recreation Management Area would not be an area expected to contribute to snag levels (EA p. 98-99), which are to be met at a landscape scale. The analysis in the EA determined that across the watershed the snag habitat requirements for primary cavity excavators are being met. EA p. 99.

53. **Comment:** *The Walton Lake proposed project area provides essential habitat for a wide range of wildlife species, including pileated woodpeckers, northern flickers, pygmy and flammulated owls, and a wide range of migratory and native songbirds (all of which would be harmed by the proposed removal of large trees which currently provide habitat for nesting and snags and logs for foraging); black bears (who forage in large logs and snags); elk, deer, and wild horses who use the forest for thermal and hiding cover when coming to drink at the lake; a variety of songbirds that would be harmed by removal of shrubs and denser forest; and potential predators such as marten, who need abundant down logs for winter foraging under snow and Gray wolves, who need hiding cover to protect themselves from people shooting them (as well as cover for effective hunting). (1)*

We are opposed to further fragmentation of habitats for so called forest health treatments that ignore natural cycles, the role of the Forest Service in creating unhealthy conditions through its past fire suppression policies. Insects are natural, fires are natural and most fires are mixed severity. (5)

We have already lost many songbirds who rely on old growth forests to survive. Don't destroy their habitat. The old snags and dying trees are home to pileated woodpeckers and flickers. Black bears love to eat the bugs and beetles living in dying trees. And a host of ungulates and small mammals enjoy the hiding and thermal cover these old forest provide. (13)

Logging will negatively impact wildlife – especially pileated woodpeckers and northern flickers, black bears, elk, deer, and wild horses who depend on forests for shelter and food. (2, 15))

We are also concerned by potential negative effects through removal of hiding cover for deer, elk, and wild horses coming to the lake to drink and the need for a buffered natural setting for a great variety of songbirds and water birds, as well as muskrat, aquatic garter snakes, and other aquatic and riparian species associated with Walton Lake. (14)

Logging would hurt several at risk species of wildlife that thrive in old and mixed forests. (18)

Please consider that those of us that live in cities need a place of respite and natural beautynot to mention (again) how many wild animals depend on wild habitat! (9)

Consideration: The Final Environmental Impact Statement (FEIS) for the Ochoco Land and Resource Management Plan (Forest Plan) disclosed that the designation of Developed Recreation Management Areas, and their focus on the recreating public and their safety, would have effects on other resources. Though the Developed Recreation Management Area does provide incidental habitat for some species, it is not intended to provide un-fragmented habitat, hiding cover, or any particular species requirements due to the focus on public use and safety. Additionally, forest diseases that affect public safety and wildfire are not appropriate in areas designated for public recreation.

54. **Comment:** *Woodpeckers in the Walton Lake project area include Pileated woodpeckers and Northern Flickers, who also require large trees, and in the case of Pileated woodpeckers, decaying fir snags and logs, especially Grand fir. Root rot areas become productive foraging grounds for Pileated woodpeckers and Black bears. Fallen logs provide denning hollows for species like woodrats and other small mammals, which provide prey for American marten. Large fir snags provide denning cavities for Sensitive-listed Pacific fisher or nesting platforms for Great Grey owls, who prefer broken topped large old growth Grand fir. Yet the proposed action and the two other action alternatives would eliminate habitat for all of these species and many more due to proposed clearcutting, conversion of mature and old growth moist mixed conifer forest to Ponderosa pine/Western larch seedlings and future even-aged plantation, and logging removal of large fir trees.* (14)

The large-diameter trees in the area of the proposed harvest are important habitat for sensitive cavity-nesting species including Flammulated Owl, White-headed Woodpecker, and Pileated Woodpecker. I have documented use of this area by these species multiple times over the past two decades. I also observed and documented the consequences of a logging sale that was similarly justified as "hazard-tree removal," in and around the Barnhouse Springs campground. The selective removal of large-diameter Douglas-fir trees from that stand resulted in reduced use of the area by Flammulated Owls. (21)

You need to do a proper biological assessment of the consequences for cavity-nesting species in general, and Flammulated Owls in particular, before cutting any large-diameter trees in that area. (21)

Consideration: The Forest Plan does not require the Developed Recreation Management Area to provide habitat for cavity nesting species. However, for Lewis' and white-headed woodpeckers, R6 Sensitive species, there would be long-term benefit to their habitat by promoting growth and longevity of large trees. Habitat requirements for primary cavity excavators (MIS) is to be met at a landscape scale; the project would affect less than 1% of the overall habitat in the watershed and would cause little to no change in the overall abundance or distribution of snags. EA p. 104 Pileated woodpecker habitat would remain above the HRV within the watershed. EA p. 108. Effects to owls are addressed in the effects to raptor habitat section. Flammulated owls are not an R6 Sensitive or Management Indicator Species. The Forest Plan provides standards to protect nests and surrounding nesting habitat if one is discovered. EA p. 25.

55. **Comments** *Habitat fragmentation from roads and trails including illegal user created roads and trails, past roads that are left open all contribute to loss of wildlife security cover and connectivity. This project exacerbates the situation.* (5)

Consideration: The project area is already developed with roads and trails, and there is not a problem with user-created roads or trails in the project area. The EA discloses that the project size is so small that a shift in cover/forage ratio is negligible at the landscape scale, and would not reduce habitat capability or carrying capacity for elk or mule deer. EA p. 107.

56. **Comment:** *Kiesha's Preserve works to protect and preserve habitats in a Regionally Significant Wildlife Corridor here and we are concerned about habitat capability, structure and function for all species across the west. (5)*

Consideration: Keisha's Preserve is located in Idaho; any wildlife corridors at that location are outside the area of effect for the Walton Lake project.

57. **Comment:** *There are 18 sensitive species with suitable habitat in the project area, such as roughly a dozen sensitive plants. The Forest Service does not properly acknowledge the damage which logging and likely introduction of invasive plant species could wreak on these already sensitive species. The Forest has not met its burden to articulate a convincing statement of reason why a project's impacts are insignificant. (14)*

Consideration: Eight terrestrial wildlife species on the Region 6 Sensitive Species list are known to have habitat in the project area. The potential effects and findings are described in the EA pp. 78-96.

There is habitat for 21 R6 Sensitive botanical species, but none were located during surveys. The potential effects and findings are described in the EA pp. 141-154. Sensitive riparian areas where most of the habitat occurs will be protected during project activities, and invasive plant prevention practices are incorporated into project design.

58. **Comment:** *The wildlife report provides a cursory and superficial explanation as to the geographic scope of the cumulative effects analysis. (14)*

Geographic scope for some animals is identical even though they are entirely different animals with different life histories. There is no individualized, species-specific explanation for the geographic scope as required by Snow Basin. (14)

A geographic scope of two subwatersheds is far too limited for species found throughout the entire national forest. (14)

Consideration: The geographic scale of cumulative effects analysis is further clarified in the EA from information that was in the Wildlife Report. See pages 75-76. Spatial and temporal boundaries were determined for each wildlife species individually.

59. **Comment:** *The agency justifies finding of no adverse effect for several species by referencing the impact at the scale of the national forest. E.g. pileated and black-backed woodpecker habitat effects negligible at the Forest scale. (14)*

Consideration: Effects are described for the project area, but findings for Management Indicator Species are appropriately made at the Forest scale because the requirement is to provide a viable population on the Forest (habitat must be provided to support a minimum number of reproductive individuals and the habitat must be well-distributed across the Forest). EA p. 97.

60. **Comment:** *Figures 17, 18, and 19 show what looks like good marten winter foraging conditions, which means these areas are also good small mammal habitat, which are prey species for many predators, including marten, coyotes, bobcats, owls, Northern goshawks and Coopers hawks, and any dispersing Canada lynx or Grey wolves. Down wood is not just "fuel". Wildlife species of many kinds need large logs, and some species need abundant down logs. Down logs are also crucial for soil nutrient cycling and carbon storage and sequestration, as well as for a great diversity of micro-fauna necessary to the functioning of the ecosystem. (14)*

Consideration: The existing condition of down wood present in the project area as well as an analysis of effects to dead and down wood from project activities is described in the EA p. 99-105.

The Forest Plan provides desired condition for fuels dependent on different forest types and Management allocations. The standards and guidelines established by the Forest Plan for

Developed Recreation Management Areas include the following related to down wood: manage residues to allow light, natural accumulations of dead and down woody debris EA. pg. 6. Therefore, it is expected that some dead and down woody debris will be retained on the forest floor after project activities.

ENVIRONMENTAL EFFECTS ANALYSIS – AQUATICS

61. **Comment:** *Fisheries, watersheds, water supplies and water quality are compromised by sediment and loss of cover thru these actions. (5)*

Logging would have adverse effects on creeks and streams, and therefore affect fish. (18)

Consideration: The EA anticipates no long-term negative effects to fisheries, watersheds, water supply, or water quality from the action alternatives. Sediment levels may be elevated during the time of operations, which could cause fish displacement and disruption of normal habits; however, the effects are on a small scale and short duration. The conclusion for Redband trout and Columbia spotted frog may impact individuals or habitat, but will not likely contribute to a trend towards federal listing or loss of viability to the population or species. EA pp. 132-137. Project design will ensure activities are implemented to comply with Forest Plan standards and guidelines. EA p. 138.

62. **Comments:** *There should be no trees over 12" dbh removed from RHCAs (we support only small conifer thinning up to 9" dbh) and these should not be removed with heavy equipment, but by hand only. We are opposed to any feller buncher or heavy equipment use within the RHCAs. What does "minimal and localized" mean in actual practice? INFISH standards are not being met if the "No Logging" buffers would be violated. Class 3 stream channels should have at least a 100 foot buffer, not 50 feet, and Class 4 stream channels should have at least 50 foot buffers, not only 25 feet. (See Revised EA p. 122, 3rd full paragraph.)*

Consideration: The EA identifies the activities that would occur within the RHCA boundaries (EA p. 134) and includes Project Design Criteria and Best Management Practices to comply with INFISH direction regarding hazard trees and minimize the potential sediment impacts from machine traffic that could occur (EA p. 25-26, Appendix A p. 183-184). This includes the hand felling of hazard trees within RHCAs that cannot be reached from the existing road; limiting machine traffic to two or fewer passes to bunch trees outside of 50 feet from Class 3 streams; and rehabilitating skid trails within the RHCAs to minimize ground disturbance and potential sediment transport to streams. As a result, treatments within the INFISH buffers for Class 3 and 4 streams in the project were determined by the project Fisheries biologist to comply with INFISH standards and guidelines, and not prevent the Riparian Management Objectives for the waterbodies present from being obtained or maintained.

ENVIRONMENTAL EFFECTS ANALYSIS – RECREATION / SCENIC QUALITY

63. **Comment:** *The Scenic Attractiveness of a landscape designation of "Typical" for the Walton Lake area does not account for why so many people go there for recreation.*

The "Typical" designation ignores all the natural values that make Walton Lake an attractive recreation destination. "Typical" seems like a purposeful diminishing of the natural setting attractiveness, which includes large and old growth trees (many of which are now planned to be eliminated), the lake itself, the associated birds and wildlife, wild flowers, interesting and secluded topography, and memorable recreational experiences based on this natural setting. (14)

Consideration: Classifications for "scenic attractiveness" is based on the guidance in the Scenery Management System Handbook (USDA Forest Service 1995d). The next highest category is "distinctive" which would apply to areas where landform, vegetation patterns, water characteristics, and cultural features combine to provide unusual, unique, or outstanding scenic quality. The EA has been updated to state that scenic attractiveness does not necessarily fall into a distinct class, but

can fall a range between indistinctive and distinctive. EA p. 66. The category of scenic attractiveness, however, does not have a bearing on the description of effects to the scenic integrity of the area which is disclosed in the EA, pp. 70-73.

64. **Comment:** *Alternative 2 is described in a highly biased pro-logging way for effects to scenic quality, failing to admit that the “Sanitation Harvest” would look like (and be like) a clearcut, a stark and visually jarring departure from the current green mature and old growth fir forest there. (14)*

Why is “Sanitation Harvest” virtual clearcutting not included in the list of management activities having potential to negatively affect landscape character and scenic integrity? (See REA p. 66) (14)

Consideration: The description of sanitation harvest clearly states that all fir trees would be removed. The effects analysis clearly states that under Alternative 2, because most trees present in Units 2, 3, and 4 are fir trees, the removal of them would cause those units to go from denser mixed-conifer fir to a more open stand with highly visible remaining large ponderosa pine and larch. The effects analysis also addresses the impact to the scenic integrity standard of the Forest Plan. The referenced introductory paragraph to the effects analysis has been updated.

65. **Comment:** *The effects analysis for visual quality effects to the moist mixed conifer area that would be clearcut fails to take into account the transformation of diverse mature and old growth moist mixed conifer forest to a virtually sterile clearcut planted with seedlings of only two tree species. This represents a loss of sense of place regarding the landscape character. This logging transformation would be enough to drive most recreationists away from Walton Lake and keep them away for many years or permanently. Sense of place is very important for the desire to return to a treasured recreational area associated with fond memories of past experiences there in the original, relatively natural forest setting. Yet despite the description of landscape character as a sense of place, this loss is not considered at all in the Revised EA analysis. (14)*

Popular recreation areas should not be the location for commercial logging. This is one of the most popular areas on the Ochoco NF, it should not be destroyed. You might find that though much of the public is unaware of this project, they will be painfully and angrily aware if you go through with it, which will destroy public trust. (13)

Most people who used to come to recreate at Walton Lake on a regular basis will likely no longer come at all. (14)

If the old growth and large trees are cut down and/or the clearcut of the proposed action or alternative 3 is implemented, I would never want to come back to the Walton Lake area for recreation. It would be far too painful and sad. The sense of place would be gone. The vast majority of people seeking natural outdoor settings for recreation like Walton Lake do not want such areas logged at all, let alone clearcut or large trees removed. If current logging plans go forward, recreational use of Walton Lake can be expected to plummet. Most of the recreationists who regularly visit Walton Lake for birding, hiking, cross country skiing, family gatherings, or relaxing might never come again, as the enjoyment would be gone. Most newcomers would not return. (14)

Consideration: The EA does not anticipate a “sterile” environment of only two tree species; it does make clear that removing fir trees in Units 2, 3, and 4 will create a more open stand and that there will certainly be visible effects. The lake is the primary attraction for the recreationists – and fishing and camping are not affected by any of the action alternatives. Scenic views from the campground and the lake are minimally affected.

The EA lays out the extensive public outreach that has taken place and gives an estimate of the impacts the project will have on recreation and scenery. It is noted in the EA that perception of changes to scenic quality varies from one person or group to another, and studies performed on the visual effects of timber harvest found that preferences toward scenic quality may be linked to an

individual's attitude or feelings toward timber harvest (EA p. 65). Though some commenters state they may not return to Walton Lake, the Forest Service has no reason to believe that the level of visitation and popularity of the lake for fishing and camping will be reduced following forest management activities. Additionally, there has been support expressed for the project and for ensuring the area is made safe. The difference of opinions expressed by the public is what led to the development of Alternatives 3 and 4. The Responsible Official considers the various points of view as well as the evidence in the EA when making their decision.

66. **Comment:** *The Walton Lake area currently does have a relatively natural outdoor setting and high quality scenic, recreational, and wildlife values that would be destroyed or greatly degraded by the proposed heavy and extensive commercial logging, "fuel" reduction, and "temporary" road building. (14)*

Consideration: The Forest Service considered this opinion that was expressed during scoping and previous comment periods. In response, the Forest Service conducted additional scoping and public involvement to foster an understanding of the purpose of the proposal; used the comments to develop Key Issues and Alternatives to be analyzed in the revised EA; and incorporated measures into the project design that would minimize adverse visual effects, promote restoration, and meet the long-term objectives for the area. The EA discloses the anticipated effects to scenery, recreation, and wildlife.

67. **Comments:** *Consider significance of effects on the local area, not Ochoco NF as a whole.*

Unique characteristics exist here, tipping in favor of significance. (14)

Consideration: The EA discloses all expected effects to the local area. Some findings are made on a Forest-wide basis (Management Indicator Species for example). Unique characteristics exist because developed recreation areas with lakes are not common on the Ochoco NF (see EA p. 160). However, the proposed alternatives would not substantially affect the use of the area as a recreation site - fishing or other enjoyment of the lake area are not affected, and camping is not affected. EA pp. 60-63.

68. **Comment:** *The proposed logging and related management actions at Walton Lake would irretrievably harm the recreational enjoyment of many people who seasonally frequent the area. (1)*

Logging will destroy habitat and opportunities for me and other people to enjoy its natural beauty. (12)

Logging would most definitely ruin the scenery of the area which is enjoyed by many people who go camping, boating, hiking, bird watching, etc. (18)

Consideration: Effects to the recreating public are minimal considering activities would take place when the site is closed and would not affect camping, fishing, or other use of the lake which are the attractions to the area.

69. **Comment:** *The negative impacts of virtual clearcutting and logging large trees would not be short-term, but last far longer than 10-15 years. Those impacts would persist for more than a century, as the missing large trees would not be replaced for at least that long, if ever. (14)*

In reality, the lasting extreme degradation to visual quality for recreation would last well beyond 10 to 15 years because the area would be transformed from relatively natural mature and old growth moist mixed conifer forest with a variety of tree species to a clearcut slowly regenerating with planted seedlings of only Ponderosa pine and Western larch. These would then become a maintained, even-aged plantation that would likely be planned for logging in the future.

Consideration: The length of time for visual effects to be more noticeable is based on the best available science and professional opinion regarding how much time it will likely take for small

trees to grow, shrubs and grasses to become established, and skid trail seeding to become established. The difference in the development of the stand over the long term in Units 2, 3, and 4 between No Action and Alternative 2 is described in the EA.

The area would not be an even-aged plantation, as all ponderosa pine and western larch that occur will be retained; these are of various ages and sizes including large trees ≥ 21 " DBH. The retained large trees would be highly visible. Hardwood species will also be planted adding visual diversity. Any future management such as thinning would be subject to the NEPA process.

70. **Comment:** *Leaving all the evidence of a timber sale ready to be logged within the Walton Lake area is contrary to Forest Plan Developed Recreation Management Area emphasis on maintaining "a relative natural outdoor setting" for recreation. For this reason the FS should have fully analyzed and disclosed what the continuance of the public closure would entail in regard to environmental impacts and effects to the recreational experience at Walton Lake. Impacts of leaving the timber sale marked are not disclosed in the revised EA. (14)*

Consideration: The EA has been clarified to state that under Alternatives 1, 3, or 4, the areas that would not be treated would have all flagging and marking removed. There would be no long-term visual impacts from the layout under any alternative.

71. **Comment:** *The proposed actions would violate the Forest Plan by failing to emphasize recreational aesthetics and to maintain the requisite "relatively natural outdoor setting" rather than a conspicuously heavily and extensively logged outdoor setting. Evidence of logging of mature and large trees (and their absence) would be evident throughout most of the Walton Lake area, including areas visible from the lake, both campgrounds, the day use area, and the loop road around the lake.*

Consideration: Visibility of activities from locations in the project area is described in the EA. There currently is evidence of the removal of mature and large trees in the area due to the continued mortality from diseases such as laminated root rot. See EA Figures 5 and 26 for example. Under the No Action Alternative the annual hazard tree falling and removal would continue, as the fir trees would continue to succumb to this and other diseases and eventually fall over. Alternative 2 on the other hand would remove the susceptible trees and promote a healthy stand of ponderosa pine and western larch. The recreational aesthetics within Units 2, 3, and 4 will be different between the Alternatives as described in the EA.

72. **Comment:** *The EA's cursory analysis is simply wrong when it says that "all components of the existing viewshed would be retained in the area overall." EA p. 178. Far from it. Instead, the project calls for a type-conversion via a near-complete destruction of the southern viewshed. (14)*

Consideration: The EA states that the scenery and immediate viewshed would be changed but all visual components would be retained in the area overall including various species of trees, various sizes and ages of trees, various stand densities, as well as the focus of the area- the lake itself. The effects analysis focuses on impacts to scenic integrity within the project area.

73. **Comment:** *The analysis of the No Action alternative for scenic quality is another biased analysis of this alternative since No Action would not inevitably result in loss of the large fir trees, many of which are not even infected by the laminated root rot. The assumption of continued root rot spread, while finally admitted to be slow, over many years, fails to account for disturbances such as wild fire and changing climatic conditions. The "root disease climax community" is also not inevitable and would also not be the end of the world. (14)*

Consideration: The description of the No Action alternative is based on best available science and the professional recommendations of the Forest Pathologist, Entomologist, and Ecologist.

74. **Comment:** *People are not just coming to Walton Lake for the developed facilities, but for the natural outdoor setting, which forms the backbone of protective Management Area designation for*

Walton Lake that would be violated through planned heavy logging, extensive commercial thinning, and removal of many large and old growth trees. (14)

It is this sense of place that would be lost with the logging removal of so many trees, which equate to more intact forest canopy, shade, associated wildlife, the sound of the wind through the trees, a natural appearance, physical contact with a relatively natural forest, associated plants, etc.. This would result not only from the proposed action and alternative 3 virtual clearcutting, but also through the planned intensity of the commercial thinning. Sense of place would be destroyed also with the removal of large and old growth trees, which resonate with people as artistically beautiful, a reminder that there is a world beyond people with living beings that have experienced more than a century of life in that place, and spiritual solace that is found in the presence of large and old trees. (14)

Sense of place associating Walton Lake with treasured recreational memories is also lost if the birds seen before no longer come there, if the lake and streams are choked with logging sediment, and if naturally appearing green, shady, diverse moist mixed conifer forest is replaced with a clearcut artificially planted with seedlings of only two species and appears for decades thereafter as a young, potentially sickly, even-age stand that is maintained as a timber plantation. (14)

Consideration: The Forest Service sought public input in several ways, including scoping letters, field trips, discussions with the local forest collaborative group, and public meetings. There is a variety of points of view and opinions about the proposed action. The ID Team and Responsible Official determined that impacts to scenic quality and removal of large trees were key issues that warranted the development of additional alternatives to the proposed action. EA pp. 9-10.

75. **Comment:** *All species of large trees are “socially valuable,” not just the Ponderosa pine singled out for this designation on Revised EA p. 59. (14)*

These old growth firs are legacy trees that the Forest Service would ordinarily be honest enough to call that and protect them from logging—or so we thought. Being in the presence of these big old growth firs is just as special as being near legacy old growth Ponderosa pines and Western larch or any other big old growth tree. There is a peace, longevity, and artistry about them that is irreplaceable and key to the recreational value of the Walton Lake area.

Consideration: The Forest Service agrees that large trees are valuable regardless of the species; but those that are structurally weakened by root disease are not desired in Developed Recreation Management Areas. Input from the public shows that there are strong feelings about maintain large trees and therefore, the Forest developed Alternative 4 which would retain all large trees, even those in the area infested by laminated root rot. The trade-off disclosed in the EA is to have that area of Units 2, 3, and 4 closed to public entry, for the Forest to deal with ongoing mortality, and to see a higher risk of bark beetle mortality in Units 1 and 5.

76. **Comment:** *The EA figures showing visual representations based on models of what the sale units would look like understate the devastation, both by still showing standing snags and by failing to show the big gaps with no trees left. (14)*

Consideration: The Stand Visualization System (SVS) uses data representing stands in the project area to provide a relative comparison of pre- and post-treatment conditions in a graphic image. The descriptions in the Scenic Quality section as well as photos throughout the EA help to provide the reader with information on what to expect from the alternatives.

77. **Comment:** *“Healthy” is not the public perception equivalent of visually attractive or a natural outdoor setting. (14)*

Consideration: The EA compares what scenery objectives are based on under the Scenery Management System versus the Visual Management System. Objectives for scenery are based in part on what is considered “healthy” under the Scenery Management System. EA p. 65.

78. **Comment:** *Actually cumulative effects to landscape character and scenery are not limited to Forest Plan amendments. This is inadequate cumulative effects analysis since Walton Lake logging degradation of landscape character and scenery are cumulative with the visible adjacent logging of the Canyon timber sale, increased development of the Walton Lake Developed Recreation area over time, evident hazard tree felling every year, and the effects of past logging within the Developed Recreation area and around the Walton lake area, along with livestock impacts in the larger setting around Walton Lake. More and more impacts to visual quality and scenic integrity can be expected to lead to less and less recreational enjoyment and use over time. (14)*

This is no adequate cumulative effects analysis under NEPA as it is merely a listing of past management actions in the area with no detailed analysis of their combined cumulative effects on specific resources or values in the Walton Lake area. For instance, adjacent Canyon timber sale logging detracted from scenic and recreational values on the east side of the lake, and now the Walton lake project proposed logging on the south, southeast, and west sides of the lake would further degrade the recreational and scenic values that the Management Area designation for Developed Recreation was designed to protect. This means that now the relatively natural outdoor setting, scenic quality, and recreational setting aesthetics all around the lake would be compromised. (See Revised EA pages 32 and 33.) (14)

Consideration: Clarifying language has been added to the area regarding the area of cumulative effects considerations. See EA p. 72. The table provided on page 35 is a listing of other projects that are considered by resource specialists in conducting cumulative effects analysis; they do not necessarily create cumulative effects for any particular resource.

ENVIRONMENTAL EFFECTS ANALYSIS – FIRE / FUELS

79. **Comment:** *Figures 16-19, photos portraying current down wood in sale unit 3, look good and healthy for wildlife habitat and soil nutrient cycling, not like excessive down wood (aka “fuels”). These are also patchy “pockets” of blow down shown, not continuous stretches of heavy down wood being consistent across the stands. I don’t remember excessive down wood in these stands; they were easy to walk through, with variable density and variable down wood levels. (14)*

Consideration: Fuel conditions for Unit 3 are displayed in Figures 20-22. The EA states that areas affected by laminated root rot with extensive mortality and windthrow have about 20 to 40 tons per acre of down wood. It is not described as continuous fuels. The desired condition for fuels in Developed Recreation Management Area is guided by the Forest Plan (EA p. 50) but the project will retain down wood throughout the area.

80. **Comment:** *The “relatively natural outdoor setting” desired for the Recreational Management Area is not natural without down logs and at least some snags. This is ridiculous tunnel vision to reduce down wood to only “fuel” considerations. Large logs also store moisture and are less likely to burn. (14)*

Consideration: There will be down logs left in the area according to requirements for wildlife habitat (resource protection measure #60). Surface fuel considerations are also guided by the desired condition in the Forest Plan. EA p. 50.

81. **Comment:** *As the Forest Service should know, decreasing canopy cover, or crown bulk density, is the least effective way to reduce wildfire risk. (14)*

The Forest Service would be increasing the risk of wild fire in the Walton Lake area by drying out the root rot stand site by removing shade-contributing firs (most of the trees); reducing overall moisture

retention by removing shade and down wood; increasing wind speeds through the stand, which increases fire intensity; and by reducing greatly the number of mature and large more fire resistant trees. (14)

Consideration: Thinning in dry mixed conifer is intended to get the stand density below the UMZ (EA p. 39) and would not remove “most” of the trees; rather it would move the stands to a range of basal areas depending on the presence of large old trees (EA p. 30). The number of mature and large ponderosa pine, which are more fire resistant, would remain the same. The Forest Vegetation Simulation (FVS) was used to model both the No Action Alternative and Alternative 2, utilizing “severe” fuel moisture and wind conditions as factors influencing fire behavior. The results provided in Table 13 suggest that “no treatment” would produce crown fire conditions and a higher mortality rate as compared to the Alternative 2 treatment option’s surface fire. EA p. 52-55. In the moist mixed conifer units, sanitation harvest would open the canopy, but the area would be reforested with more resilient ponderosa pine and hardwood species would also be planted.

It is acknowledged that proposed treatments may allow for increased solar radiation to reach the forest floor and may result in lower fuel moistures, higher wind speeds, and increased growth of flammable grasses, forbs, and shrubs, particularly in Units 2, 3, and 4. Fuels treatments to remove slash and reach the desired condition would occur. Overall reduction in expected fire behavior and fire severity usually outweigh the changes in fire weather factors such as wind speed and fuel moisture (Weatherspoon 1996, Bigelow and North 2012).

82. **Comment:** *The Canyon Fuels and Vegetation Management Project (2010) reduction of “fuels” and moderation of the risk of wild fire entering the Walton Lake Developed Recreation Area from the outside should be weighed against the perceived need to substantially reduce down wood and live trees in the Walton Lake area. Yet all the “fuel” reduction all around Walton Lake is now not considered enough, even though a lot of it was planned to help reduce fire risk to the Walton Lake area. (14)*

There’s already been a lot of “fuel” reduction and commercial thinning all around the lake. The Developed Recreation area is also surrounded by relatively wide paved roads which serve as fuel breaks. (14)

The biggest fire risk around Walton Lake is likely the still un-burned piles of slash from the adjacent Canyon timber sale. If the Forest Service is really that concerned about fire risk, why haven’t these many dry slash piles been removed before yet another fire season? (14)

Consideration: At the larger landscape level, the Canyon Fuels and Vegetation Management Project did reduce fuels and moderate risk of wildfire entering the Walton Lake project area from the outside EA pp. 55-56. A small amount of pile burning is yet to be completed for that project. Fuel treatments and thinning within the Walton Lake project area will provide further risk reduction, particularly in the immediate vicinity of camping and day use facilities, where the Forest Plan requires aggressive suppression action to wildfires that may threaten life, private property, public safety, improvements, or investments. EA p. 50. There will be down wood retained in the project area. EA p. 28.

83. **Comment:** *Whole tree yarding results in large slash piles that are unsightly and severely damaging to soil when burned. It is also inconsistent with the natural processes that retain woody material and nutrients onsite when and where trees experience mortality. (17)*

Consideration: In most of the area, following the whole-tree yarded to the landings, it will then be removed for burning off-site. Landing piles would only be burned in Unit 5 and part of Unit 4 furthest away from camping areas. EA p. 23.

ENVIRONMENTAL EFFECTS ANALYSIS – SOILS AND GEOLOGY

84. **Comment:** *It is not clear that existing detrimental soil disturbance in the proposed sale units has been added to the detrimental soil compaction percentage of each sale unit that would be affected in Table 25. On page 120 the analysis acknowledges that “all proposed treatment blocks are estimated to have less than 5% existing detrimental disturbance.” Yet the percentage of existing detrimental soil disturbance is not specified for each sale unit. (14)*

Consideration: The existing condition of the proposed units was estimated to be below 5% based on observed impacts from previous management activities during walk-throughs of the units. Most of the existing impacts are old skid trails and “road” beds like that present in Unit 4 that would be utilized as part of the logging system for this entry and are not additive to the aerial extent estimated for the logging system designed for this entry if they are re-used. Existing impacts that would not be re-used are negligible but would count toward a final assessment of total detrimental disturbance when the unit was monitored for compliance with the Forest Plan.

85. *The 16 to 17% detrimental soil compaction figures for these sale units are based on the assumption that all project design criteria (PDCs) and Best Management Practices (BMPs) are applied and are 100% successful. PDCs and BMPs are not always applied as planned and are not always completely effective. For example soil tillage (subsoiling) may not occur if funding is not available. Other PDCs may also not be implemented if funding is not available or if a contractor neglects to implement a project design criteria or follow a Best Management Practice. (14)*

Consideration: The analysis of effects to the soil resource does assume the successful implementation and efficacy of PDCs included in the EA to help minimize detrimental disturbance within the activity units (EA p. 126). PDCs and BMPs are brought forward in the Timber Sale contract as requirements for the contractor to follow during implementation. Skid trail spacing, unit layout and travel limitations for harvest, yarding and piling machinery are effective in reducing the aerial extent of detrimental disturbance and are enforced by the Sale Administrator during implementation to ensure their use. Obliteration and subsoiling of temporary roads are included as PDCs and are not funding related. A PDC has been added to subsoil landings and primary skid trails if overall compaction levels exceeded the 20% threshold following the proposed activities (EA p. 26).

86. *The percentage of soil compaction per sale unit estimates in Table 25 also do not take into account all the soil disturbance between (or outside of) skid trails, landings, and “temporary” roads. An increase of only 4% detrimental soil compaction would be enough to cause sale units 2, 3, and 4 to exceed the Forest Plan standard for detrimental soil impacts, and a 5% increase would be enough to cause sale unit 1 to exceed the Forest Plan standard, based on Table 25. Additional sources add up to potentially exceed standards. (14)*

Consideration: The comment is correct that Table 26 in the revised EA did not include potential soil disturbance between skid trails and landings. The analysis acknowledged that impacts from feller buncher traffic off skid trails could incur up to 5% additional detrimental disturbance (EA pp. 127-128) but did not summarize the total potential detrimental disturbance for the proposed activity units. Table 26 has been modified to include the estimated potential extent of detrimental disturbance within each unit following harvest, yarding and fuels treatment activities. Table 26 also overestimated landing sizes necessary for the accumulation and processing of material. Projected landing sizes for units 1 and 5 are ¼ acre each, while those needed for units 2, 3 and 4 would be approximately ½ acre each. The number of landings necessary for processing are generally based on a 1 per 10 acres basis.

Estimates of total detrimental compaction within activity area units are based on the silvicultural prescription and a conceptual logging plan for each unit, including the number of trees per acre proposed for removal, the need and potential location of temporary roads and the number of landings necessary to accumulate and process the material proposed for harvest. Designated skid

trails cover 11% to 13% of an activity area when spaced at 100 or 75 feet, respectively, while landings generally range from 1 to 2% of the unit area (Ochoco Soil Monitoring Reports). Temporary roads projected for units 1, 2, 3 and 4, along with the existing road in unit 5, cover less than 1% of the activity areas and would be subsoiled to restore them to productive ground following harvest, yarding and piling treatments.

Although the implementation of a planned logging system in an activity area with low existing levels of disturbance will generally meet the 20% disturbance threshold (Ochoco Soil Monitoring reports), units 2, 3 and 4 will have a high number of trees per acre removed requiring a greater number of off trail trips that could result in levels temporarily exceeding 20%. A PDC has been added to subsoil primary skid trails and landings within any of the activity units that did not meet the 20% threshold for productivity following proposed harvest, yarding and fuels treatment activities (EA p. 26).

87. **Comment:** *The methodology behind assumptions that off trail detrimental soil disturbance would be “less than 5%” from off trail traffic of machine harvesting equipment used to cut and bunch material onto skid trails and “less than 2%” for apparently additional impacts from off trail feller bunchers along road 2220 is not disclosed. Nor is the exact percentage of these additional off trail detrimental soil impacts for each sale unit calculated. Instead these seem to be rough estimates which could be exceeded. Even if the combined additional soil disturbance is only 5% for sale units 2, 3, and 4, this is enough additional soil disturbance to violate the Forest Plan standard. For units 2, 3, and 4 it is very unlikely that detrimental soil impacts would be limited to 17% of the sale unit areas, given the very heavy logging and associated log and slash removal planned. (14)*

We are concerned that soil productivity would not be maintained “over 80% or more of each unit.” (Revised EA p. 122) As described above, detrimental soil impacts would not just be limited to “harvest system infrastructure” (i.e. skid trails, landings, and “temporary” roads.) The soil effects analysis acknowledges the following effects to soil productivity from soil compaction alone (not including displacement and loss of the top organic soil horizon layer): “Detrimental compaction of mineral soil reduces porosity, decreases infiltration rates and can result in less water, air and nutrient availability to vegetative roots within the soil profile. Increased bulk density can also affect tree root growth and mycorrhizal symbiosis with roots by increasing mechanical resistance within the mineral soil profile.” (Revised EA p. 122, 3rd to last paragraph) (14)

Consideration: Monitoring reports of past harvest units on the Forest show that less than 5% additional detrimental disturbance is likely to occur as a result of off trail travel (USDA Forest Service 2007, 2009, 2014), primarily due to BMPs that limit machine passes over the same piece of ground when traveling off established trails and restrictions of grapple piling machinery to established skid trails (Appendix A, EA p. 183 and 184). The low levels of existing compaction that this entry could overlap and cumulatively affect the soil resource in excess of detrimental compaction thresholds would also limit the extent of detrimental disturbance between skid trails.

See also consideration of comment #85 for the addition of total detrimental disturbance estimates for Units 2, 3 and 4 in a revised Table 26. Proposed activities would remove approximately 40 trees per acre from units 1 and 5, which is similar to monitored thinning prescriptions elsewhere on the Forest and are likely to meet the 20% threshold for productivity. An average of 80 trees per acre would be removed from units 2, 3 and 4 and detrimental disturbance levels between skid trails could increase enough to temporarily exceed the 20% threshold for productivity following harvest and fuels treatments. A PDC has been added to the EA to subsoil landings and portions of primary skid trails in these units to reduce the aerial extent of detrimental disturbance and reduce the activity areas below the 20% threshold in order to maintain soil productivity on site (EA p. 26).

88. **Comment:** *Compaction is not the only detrimental soil impact that would be caused. The high level of compaction in all of the commercial sale units (including unit 5) of combined .4 acre to 1.3 acres*

of skid trails for each sale unit, 1 to 3 acres of landings for each sale unit, plus .1 to .3 acres of “temporary” road compaction per sale unit for units 1, 2, 3, and 4 would just be the starting point for further detrimental soil impacts of erosion and sediment travel when water is channeled on these compacted surfaces. (14)

Consideration: The analysis acknowledges that erosional loss could indirectly occur as a result of mechanical traffic. However, an erosion control plan would be included in the Timber Sale contract to address all disturbed areas including skid trails, roads and landings. Erosion control plans include the placement of water bars on skid trails to impede the energy and sediment transport of overland flows; the placement of slash on disturbed surfaces to intercept raindrops and provide microsites for moisture retention; and the seeding of disturbed surfaces to promote re-vegetation. (Best Management Practices, Appendix A). As a result, erosion and sediment travel from these surfaces would be minimal and localized.

89. *Displacement of easily displaced ash soil would first displace the organic top horizon layer (Horizon A), which is also not taken into account throughout the sale units in Table 25. All of these detrimental soil impacts not accounted for in Table 25 combined means that detrimental soil impacts are likely to exceed the Forest Plan standard for detrimental soil impacts. It’s noteworthy that no assurance is given in the soil effects analysis that Forest Plan standards for detrimental soil impacts will not be exceeded. (14)*

Consideration: Table 26 has been updated to reflect estimated levels of soil disturbance that could result from the proposed activities and show that detrimental soil impacts may temporarily be exceeded before restoration subsoiling occurs. See response to comment #86 for a summary of the predicted aerial extent of detrimental disturbance.

90. *The soil effects analysis clarifies that detrimental soil impacts are not limited to compaction (which is the only form of detrimental soil impact in Table 25): “Direct effects to the soil resource as a result of proposed ground-based mechanical harvest and yarding activities would include detrimental disturbance of mineral soil in the form of compaction, displacement or puddling. Indirect effects could include erosion losses from disturbed sites as a result of mechanical traffic and compaction.” (Revised EA p. 121, 1st par. under “Alternative 2”) (14)*

Consideration: The potential effects of displacement, puddling, and erosion are described in the soils analysis (EA pp. 129-130). PDCs and BMPs are in place to limit the extent of the detrimental forms of these disturbances, including limitations to off trail maneuvering of feller bunchers to reduce displacement; Seasonal harvesting and yarding to avoid wet conditions favorable for puddling soils; and the inclusion of an erosion control plan to minimize the energy and channelization of overland flows during storm events (EA p. 24; Appendix A pp. 182-183). As a result, these forms of disturbance combined are likely to meet detrimental criteria on less than 1% of any of the proposed activity areas.

91. **Comment:** *Grapple pile burning on skid trails is not a “negligible” effect, as burning of grapple piles often burns intensely, reducing the area to bare, sterilized mineral soils that would be very slow to recover from loss of the organic soil horizon (Horizon A). (14)*

Consideration: The analysis determined that impacts from piling material with grapple machinery would have a negligible effect on the soil resource since machinery would be restricted to skid trails and landings that were already impacted and in a detrimental condition (EA p. 128). Grapple piles would also be located on skid trails to overlap the potential effects from burning the piles with existing compaction disturbance in order to limit any increase in the aerial extent of detrimental disturbance within the activity area should it occur from the burn piles. The analysis did not disclose potential effects to the soil resource from burning the piles.

The extent to which burning of grapple piles affects the chemical and biotic components of the soil resource depends primarily on the composition and density of the pile, as well as the conductive properties of the mineral soil (Busse, et al., 2013). The material piled within a unit following a whole tree harvest is generally in the medium to small category which should reduce the duration of elevated temperatures. Regardless, some of the biotic and chemical components would be consumed and altered, respectively, underneath these piles. However, bacterial and fungal populations do return these sites in subsequent years and the sites can support vegetative growth within a few years (Shea, 1993). In the meantime, these areas would fall within the portion of the unit considered to be detrimentally disturbed.

92. **Comment:** *The soil effects analysis also raises concerns regarding detrimental displacement of soils directly causing loss of soil productivity: “Detrimental Displacement: Described as the removal of greater than 50% of the A horizon material over an area greater than 100 square feet. Side hill traffic by harvest or skidding machinery under very dry conditions, multiple turns over the same piece of ground, or temporary road construction have the potential to displace the mineral A horizon over a large enough area to meet this criteria in Blocks 1 and 3. Displaced soils can have reduced productivity due to the loss of A horizon material and are often channelized and loosened so that they are more susceptible to erosion.” (Revised EA p. 123, with one corrected word: “than” was changed to “that” in the last sentence.) (14)*

We are concerned that detrimental soil displacement could take place in Blocks 1 and 3 (sale units 1, 2, 3, 4, and 5.) We are also concerned that displaced soils can have reduced productivity not favorable to forest health or biodiversity. Displaced soils are often channelized and loosened so that they are more susceptible to erosion. The soil effects analysis warns of the following foreseeable soil displacement and loss of the organic top soil: “Areas designated for commercial machine thinning within treatment units 1 thru (sic) 5 will have machine traffic from feller bunchers and skidders capable of displacing surface soil from side hill travel or maneuvers to or along skid trails. Slopes within these units are variable but combine with deeper ash soils to be conducive to this process....Displacement of soil will occur to create approximately 1,400 feet of temporary roads to access landings in treatment units 3 and 4. These temporary roads would contour along 20 to 25% slopes where the uphill side of the road bed would be gouged enough to displace the A horizon.” (Revised EA p. 123, the first two bullet points) (14)

There is no guarantee that such displacement of soil would be limited to less than 100 square feet, especially not when uphill slopes of 20-25% are being “gouged enough to displace the A horizon.” PDCs may be designed with the intention of mitigating these impacts but there is no guarantee that they will be effective in doing so. (14)

Consideration: The soil analysis acknowledges that the displacement of soil would occur as a result of the proposed activities, primarily where temporary roads are created along steeper side slopes and where machinery maneuvers on steeper slopes off of skid trails to fell and bunch material. However, the likelihood of displacement caused by feller-bunchers meeting the detrimental criteria listed in the soils report is very low. Detrimental displacement is more likely where temporary roads are created across steeper sideslopes that require some amount of benching to form a level driving surface. However, this would occur on less than 1% of a given activity unit and detrimental conditions would be short lived with the implementation of PDC #17, which requires the obliteration and restoration of temporary roads created during the project, including the blading back of displaced soil (Project Design Criteria, EA p. 26). The restoration of temporary roads by returning displaced soil, subsoiling compacted mineral soil and replacing organic slash on the surface would return the soil resource to a productive condition capable of supporting vegetative growth in the immediate years after completion.

93. **Comment:** *Further, the soil effects analysis identifies potential for erosion impacts to soil: “Erosion: The proposed activities could indirectly cause erosion to occur as the result of compaction, displacement and/or exposure of mineral soil to wind and overland flow during rain storms. The removal or mixing of surface organics with mineral soil could also make areas of the soil resource susceptible to erosion.” (Revised EA p. 123) (14)*

The effects of potential erosion are also not taken into account in Table 25. (14)

The soil effects analysis also raises the potential impact of reduced infiltration and sediment transport off site: “Reduced infiltration can indirectly affect the soil resource by increasing overland flow energies and volumes during rain fall events to levels capable of detaching mineral soil and transporting it off site. Skid trails located on slopes are the most susceptible areas for this to occur following the proposed activities.” (Revised EA p. 122, 2nd to last paragraph) (14)

Consideration: Table 26 summarizes the potential extent of detrimental disturbances from the proposed activities and does not include potential erosional losses that are not considered detrimental. Erosion is an active natural process that can be exacerbated by ground disturbing activities. The analysis acknowledges that skid trails and temporary roads would be susceptible to erosion while being used for harvest and yarding activities. An erosion control plan would be in place to install sediment and stormwater controls on logging infrastructure during and following proposed activities. The plan would also include routine inspection of temporary roads to verify that erosion and stormwater controls are implemented, functioning and appropriately maintained (EA Appendix A, pp. 181-182). In addition, all temporary road surfaces and some skid trails would be subsoiled and covered with organic slash to increase raindrop intercept and infiltration capacities in order to reduce the accumulation and energies of overland flows (EA p. 26). As a result, any erosional losses would be localized and within acceptable criteria as a result of this project and are not included in Table 26.

94. **Comment:** *We remain concerned after reading the analysis that reduced infiltration of water into the soil will increase overland flow energy and volume during rain fall to levels capable of detaching mineral soil and transporting it off site into streams, wetlands, and ultimately the lake. Feller buncher impacts to RHCAs are alluded to in the analysis. Logging adjacent to RHCAs would be very heavy with lots of detrimental compaction surfaces for overland flow in units 2, 3, and 4. There would be excessive soil disturbance and removal of stabilizing trees in these sale units which would resemble a highly disturbed clearcut after logging. The RHCA buffers are identified as being less than INFISH requires for Class 3 and 4 stream channels. INFISH buffers are based on solid science. We are concerned by potential impacts to fish and other aquatic organisms in the streams and the lake due to excess fine sediment loading. Rainfall also now tends to be more intense and heavier when it occurs due to climate change, increasing the potential for overland flows. There would be little plant cover left to slow these flows—especially in sale units 2, 3, and 4. Plant cover would also be reduced in sale units 1 and 5. (14)*

Consideration: INFISH established Riparian Habitat Conservation Areas (RHCAs) to help maintain the integrity of aquatic ecosystems and included landscape-scale interim Riparian Management Objectives (RMOs) to describe desired conditions for fish habitat. Management within these buffers can occur if the short term effects of the project do not prevent or retard the attainment of RMOs. INFISH standard/guideline RA-2 allows trees to be felled in RHCAs when they pose a safety risk and directs them to be kept on site when needed to meet woody debris objectives. (USDA Forest Service 1995, p. E-12).

The EA identifies the activities that would occur within the RHCA boundaries (EA p. 133) and includes Project Design Criteria and Best Management Practices to comply with INFISH direction regarding hazard trees and minimize the potential sediment impacts from machine traffic that could occur (EA pp. 25-26, Appendix A pp. 183-184). This includes the hand felling of hazard trees within

RHCAs that cannot be reached from the existing road; limiting machine traffic to two or fewer passes to bunch trees outside of 50 feet from Class 3 streams; and rehabilitating skid trails within the RHCAs to minimize ground disturbance and potential sediment transport to streams. As a result, treatments within the INFISH buffers for Class 3 and 4 streams in the project were determined by the project Fisheries biologist to comply with INFISH standards and guidelines, and not prevent the Riparian Management Objectives for the waterbodies present from being obtained or maintained.

95. **Comment:** *The soil analysis does not lead to the conclusion that proposed activities would not increase soil disturbance above Forest Plan thresholds for maintaining soil productivity in units 1 through 5 and thus does not justify the conclusion that there would be no cumulative effects to soils within the sale units. The existence of cumulative effects to soils are also not dependent on exceeding thresholds for soil productivity due to the proposed management actions. This is an evasion to avoid doing cumulative effects analysis for soils in the project area. Cumulative effects from past logging, hazard tree removal, and past road construction in the sale units (which are still evident, based on our field surveying and Revised EA mention of this evidence) are thus not being considered in combination with planned logging, road building, and other impacts of proposed management actions. (See Revised EA p. 124 under “Cumulative effects”).* (14)

Consideration: The cumulative effects analysis has been updated for the soil resource. Detrimental impacts from previous management activities, while present, are estimated to cover less than 5% of any of the proposed activity areas and are not likely to cause the overall level of detrimental impacts following the proposed management actions to exceed the 20% threshold in units 1 and 5. However, the cumulative sum of past and potential detrimental disturbances in Units 2, 3 and 4 may temporarily exceed the 20% threshold following harvest, yarding and fuels treatment activities (see Consideration of Comment #86) until landings and portions of primary skid trails are subsoiled (EA p. 26, PDC #27).

96. **Comment:** *The geology effects analysis bolsters our concerns about the high potential for detrimental soil impacts from the proposed timber sale: “The entire planning area is underlain by dormant landslide terrain. When there is a change in the ground water flow through the unstable terrain on slopes >20%, the potential is increased for slope movement. Rapid shallow debris flows and deeper rotational slides can result, altering the vegetation potential and possibly releasing sediment into the stream systems, depending on proximity to the riparian areas.”* (14)

“For all the units in the action alternative, primary concern from a mass wasting standpoint is for those units on dormant landslide terrain. Mapped landslide debris underlies all the commercial units and other proposed activities for 175 acres. Landslide terrain tends to develop unusual subsurface drainage patterns. The intensity and style of management activity on landslide terrain, in the vicinity of seeps and springs, could potentially change the drainage pattern, possibly increasing the risk for instability.” (14)

Consideration: The analysis identifies that “the intensity and style of management activity on landslide terrain, in the vicinity of seeps and springs, could potentially change the drainage pattern, possibly increasing the risk for instability (emphasis added).” The dormant landslide terrain in the project area has an inherent risk for movement, albeit low and very slow when it does move. The project would take measures to minimize this risk by avoiding surface seeps on the ground and decompacting and recontouring temporary roads that cut laterally across slopes to allow downhill subsurface flow to continue unimpeded (EA p. 25-26).

97. **Comment:** *“The more intensive treatments in units 2, 3, and 4 have the potential to reduce the evapotranspiration which leaves more groundwater in the slope.”* (all excerpts from Revised EA geology effects analysis on p. 133) (14)

Consideration: Physically reducing forest density and canopy in units 2, 3 and 4 would decrease evapotranspirative use and likely increase soil moisture within the treated units in the short term. The degree to which groundwater volumes or flow patterns would be affected is not clear. The reduction in canopy cover in units 2, 3 and 4 would be similar to but less than a stand replacement forest fire and without the complete loss of surface vegetation indicating that this would be within the range of a natural event on this landscape. The analysis acknowledges that the chances of reactivating a dormant landslide are very low as a result of these activities.

ENVIRONMENTAL EFFECTS ANALYSIS – OTHER ISSUES

98. **Comment:** *Insects are natural, fires are natural and most fires are mixed severity. The least roaded, wilderness and other protected areas without past logging and treatments suffer the least fire severity. (5)*

Consideration: The area is already developed with roads. The Forest Plan requires aggressive fire suppression in an area with recreation infrastructure. EA p. 50.

99. **Comment:** *Climate change is also accelerated through projects such as this. Instead, carbon sequestration and climate can be enhanced through not carrying it out. See the Forest Service Roadmap for Climate Change regarding these points and the need for habitat restoration and connectivity. (5)*

Clearcutting is an egregious felony to intact forests so necessary to carbon stores. Have you studied the cumulative effects of this type of work in the light of climate change? [note attachment: Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good.]. (13)

Consideration: The scale of this project area (< 200 acres) is too small to measure an effect on enhancing climate. The project area will remain forested, and additional tree planting will occur.

100. **Comment:** *Deforestation is the 2nd cause of climate change. Since the earth is experiencing great weather changes, especially hurricanes and floods it is only COMMON SENSE to delay all clear cutting, especially 'old forests' which sequester carbon. The unprecedented 'caution' being taken now to stop the spread of coronavirus in U.S. shows the compassion of a nation to stop any unnecessary deaths. We are 'learning' that LIFE is valuable and not the economy. Please consider how this action may cause DEATHS due to climate change around the world and do NOT allow the sale of this land for lumber. (10)*

Consideration: See Chapter 2 for a description of the alternatives. The land will not be sold for lumber, and the area is not going to be deforested.

101. **Comment:** *The Revised EA also fails to analyze the impacts of the Walton Lake project to climate change and cumulative impacts from extreme climate change to the Walton Lake area when combined with the planned intensive logging of mature and old growth moist forest and extensive logging of large trees, which are clearly contrary to IPCC recommendations for reducing climate change effects as well as contrary to other high quality increasingly calling for protection of mature and large trees from logging to retain needed carbon storage and carbon sequestration. (14)*

Large trees are also more valuable than small trees for carbon storage and sequestration to slow climate change, for soil nutrient cycling, for wildlife habitat niches for many species, for good riparian conditions for fish, and for recreational and scenic values. (14)

Consideration: Under Alternative 2 and 3, large ponderosa pine in Units 1, 5 will be maintained through thinning out young fir around them and in Units 2, 3, and 4 the large ponderosa pine and western larch will be retained. See effects to large tree abundance, EA pp. 44-49.

102. **Comment:** *This also confirms our suspicions that this is indeed an old growth/large tree timber grab that would be very lucrative for the timber industry. Such an old growth timber sale would be highly unlikely to take place without all the misleading information and omissions regarding what is really being planned to the public and hiding of what would take place on the ground behind a public closure with hefty fines for its violation. (14)*

Consideration: Alternative 2 involves less than 80 acres of harvest of trees with commercial value - the value of which would partially offset other service work. At approximately 890 MBF board feet, it would represent less than 6% of the Ochoco National Forest's typical annual timber sale offer. The purpose of the closure has been explained, see response to comments #16-25 related to public safety.

103. **Comment:** *Wildlife viruses are jumping to human beings all over the world and one of the reasons is that humans are destroying habitats. Wildlife biologists know this, health experts know it, and increasingly the public knows it. And there are plenty of people to call upon to testify or to cite in a court going forward. Kate Jones, a US ecologist, says "We are researching how species in degraded habitats are likely to carry more viruses which can infect humans," she says. "Simpler systems get an amplification effect. Destroy landscapes, and the species you are left with are the ones humans get the diseases from." US Forests are included and Lyme Disease is the prime example. <https://www.theguardian.com/environment/2020/mar/18/tip-of-the-iceberg-is-our-destruction-of-nature-responsible-for-covid-19-aoe> (15)*

Consideration: The potential source of global pandemics is outside the scope of this analysis. The project does not seek to simplify the ecosystem or destroy the landscape. The EA shows that there would be a minimal effect on wildlife and habitat, and there would be no effect on wildlife populations or species richness.

104. **Comment:** *Your botany report does not support the project at all and conveys yet more risk of invasive species and diseases if the action is taken. (15)*

Consideration: The botany report discloses the potential effects of the alternatives and also provides several measures to reduce the risk of invasive plant introduction and spread during implementation. EA p. 24.

COMMENTS ON PROCESS

105. **Comments:** *If for some rationale the agency feels it is necessary to proceed with a management project in this location, federal environmental policy laws are explicitly clear that such can only be legally done by initiating a full-scale Environmental Impact Statement public process. Such a process must notify and solicit public comment with widespread public outreach that includes the hometowns and cities of recreational visitors, especially those within the greater accessible region, including Portland and Eugene. (1)*

I respectfully ask for the entire Walton Lake timber sale to be dropped or for an Environmental Impact Statement to be prepared for public comment with far greater public outreach solicitation that includes the hometowns and cities of recreational visitors, including Portland and Eugene. (7, 12, 13, 14, 20)

Public participation process is flawed because the Forest Service failed to re-scope the project when it completed an EA in 2017. (14)

The Ochoco Forest Restoration Collaborative is not reflective of the full spectrum of values held by the public at large, as suggested on p. 8 of the Revised EA. (14)

I would ask that this entire sale be dropped or at the very least, an EIS to be prepared so that the public that uses this area can comment. (9)

The Forest Service failed to notify BMBP that the NEPA process was restarting. The Forest Service did not notify BMBP of a June 2019 public information meeting. (14)

Because of the coronavirus pandemic I ask for a new comment period on this project. It's just not fair to expect regular people to be able to comment on this project at the beginning of a major worldwide pandemic. (16)

The FS arbitrarily refused a request to extend the comment period or to notice a second comment period because of the recently declared national and state emergencies. (14)

Consideration: This project has complied with law, regulation, and policy concerning public involvement. This project is not one that normally requires preparation of an Environmental Impact Statement (EIS) pursuant to Forest Service NEPA regulations at 36 CFR 220.5. Based on the environmental effects disclosed in the revised EA, there is no potential for the project to have significant effects on the quality of the human environment and therefore there is no requirement to complete an environmental impact statement.

Public involvement opportunities related to the Walton Lake Project are described in the project record and EA. All analysis documents were publicly available during the comment period. Notification of the 30-day public comment period offered on the February 2020 Revised EA included multiple avenues for contacting the agency, including email, phone, mail, or in person. Comments were successfully received during the latest comment period through the online comment system, email, phone, and mail.

106. **Comment:** *The current NEPA process has conducted an illegal scoping process because our February FOIA request was not fulfilled. (14)*

Consideration: The Forest Service complied with law, regulation, and policy in conducting the public involvement processes for this project. The Forest Service received a request for records on February 25, 2020. On February 27, 2020 the Forest Service released 30 pages of records responsive to what the requester deemed a priority for being able to comment on the EA. The Forest Service released an additional 219 pages of records on March 9, 2020 fully 10 days before the end of the comment period.

107. **Comment:** *Significant omissions include failure to meet NEPA requirements for full public disclosure by not revealing that the past history of this timber sale includes the Forest Service fully marking the timber sale to be logged, including trees being paint marked to cut or leave, sale unit boundary signs being posted, and flagging to indicate components of the sale such as skid trails—and putting out and executing a contract for selling the sale to a timber company—all before any final decision on the Walton Lake project. This process is illegal. (14)*

The Forest Service should disclose in the EA the entire history of the project, including CE and court decision etc. etc. (14)

Full public disclosure is necessary because the timber sale is still all marked to be sold and this could be a motivating factor for the Forest Service to persist in pushing this sale since 2016 despite having already been defeated twice and despite inherent violations of the Forest Plan that would be involved to implement the sale as proposed. (14)

Funding was already poured into marking the sale, which has been already granted to a logging company before the final decision, which is illegal. (14)

As the contract has not been rescinded and is only on hold, the FS has continued to commit itself to the Proposed Alternative before the completion of the EA in violation of NEPA. The EA serves only to justify the decision to log the area. (14)

Consideration: The motivation for pursuing the project is outlined in the description of the current conditions, purpose and need statement, and management direction (EA pp. 1-6). The Forest Service has prepared a revised EA to incorporate additional public involvement into the decision-making process, to analyze additional alternatives that address public issues, and to inform the public of additional Forest Plan amendments that are necessary to implement some of the alternatives. The requirements for an EA are listed in Forest Service NEPA regulations at 36 CFR 220.7. There is no requirement to provide a history of previous planning efforts in an EA; however, the EA does make note of past NEPA documents and the purpose of reinitiating the NEPA process on p. 1.

Following the 2015 Decision Memo that authorized the proposed action, the Forest Service marked unit boundaries and painted trees in the commercial harvest units (1, 5) for removal. The Forest Service is not hiding tree marking in the laminated root rot-infested units (2, 3, and 4) because no trees in those units have been painted. The sanitation harvest treatment is clearly described as removal of all susceptible host species; therefore, tree marking would not be necessary.

The unit boundaries and tree marking would be modified or removed, depending on the alternative selected in the final decision. Most importantly, the Forest Service will not take action until the Responsible Official issues a final Decision Notice.

108. **Comment:** *The sign later posted near the campground is very misleading, disclosing only that commercial thinning would take place, omitting planned sanitation harvest. (14)*

Consideration: The Forest Service updated public signage at the Walton Lake kiosk in 2019 and again posted an update as the area was opening to the public in 2020. It's unclear what sign the commenter is referring to.

FOREST PLAN CONSISTENCY AND FOREST PLAN AMENDMENTS

109. **Comments:** *The use of four site-specific Forest Plan amendments to implement the Walton Lake Project is both legal and appropriate as described under the Purpose & Need. The National Forest Management Act authorizes the Forest Service to amend a Forest Plan in "any manner whatsoever." 16 U.S.C. § 1604(f)(4). The need for the forest plan amendments is to 1) remove trees that are equal to or greater than 21 inches at diameter breast height (dbh), 2) conduct sanitation operations within late and old structure (LOS), and 3) create regeneration units larger than may be visible to the casual observer that is tied to both public safety and the best available science. Without the use of these site-specific forest plan amendments this project will not achieve its public safety or forest health goals. (2)*

Logging of large and old growth trees, sanitation harvest, logging of popular recreation sites violates the Forest Plan standards and must be prohibited. (12)

No amendments should be used to get around the contract you made with the American Public. You are bound to protect wildlife habitat and recreational values in this area. (13)

The Forest Service proposed action is being used to justify Forest Plan amendments and de facto violations of the Forest Plan rather than the Forest Plan determining a more appropriate alternative for the Walton Lake area. (14)

NFMA requires adherence to the Forest Plan or else revision of the entire Forest Plan for general changes such as changes in overall conditions (which could include increased wildfire concerns.) (14)

We do not support the plan amendments that allow loss of LOS forest and removal of large trees. The forest plan should be regarded as the best approach to balancing competing objectives. It's not like root rot evolved after the forest plan was adopted. The authors of the Forest plan already knew about

all the various forest health risks when the plan was written and adopted standards that balanced all the known considerations. (17)

Consideration: Also see previous responses related to LOS, large trees, and scenic quality. The EA points out that the overall objectives of providing for public safety cannot be fully realized, and the standard to treat root diseases in the Developed Recreation Management Area cannot be fully adhered to, unless amendments to other standards are included.

NFMA implementing regulations at 36 CFR 219.13 state: “A plan may be amended at any time. Amendments may be broad or narrow, and should be used to keep plans current and help adapt to new information or changing circumstances. The responsible official has the discretion to determine whether and how to amend the plan.” The amendments for this project are narrowly constructed to be applicable to specific acres for specific purposes, and they allow the Forest Plan to adapt to the new information and changing conditions at the project site. EA pp. 28-30, 157-160.

110. **Comment:** *The Forest Plan Amendments are not site-specific or unique and are being driven by the Proposed Action to allow for violations of the Forest Plan. (14)*

Basal area reduction desires (Revised EA p. 12) are hardly a sufficient argument for violating the Eastside Screens and the Forest Plan. There is nothing unique or site-specific about the Forest Service desire for basal area reduction, which appears in almost every current and recent timber sale proposal across the Ochoco National Forest and other Eastern and Central Oregon National Forests. (14)

These are not really site-specific or unique Forest Plan amendments, as the root rot situation described is not unique to the Walton Lake area, but common throughout the Ochoco National Forest in moist mixed conifer forest. Both laminated root disease and trees competing with each other for water, nutrients, or sunlight are natural parts of the forest ecosystem and widespread across the entire Ochoco National Forest, as well as other Eastern and Central Oregon National Forests. (14)

There must be at least some characteristics unique to a site to support a site-specific amendment. (14)

The EA admits that LRR is widespread throughout the Ochoco NF. There is no evidence in the EA to support the statement that LRR is rarely found in Developed Recreation Management Area; need supporting evidence about presence of LRR in other Developed Recreation Management Areas. The Forest Service acknowledged the presence of LRR in federal campgrounds in the Pacific Northwest. (14)

It is unique site characteristics that justify the use of site-specific amendments, not whether or not the Forest Service has used this type of site-specific amendment before. (14)

The EA lists unique features that are irrelevant to the analysis and that are unique to the planning process rather than site (amendments not commonly used or never used, small size of project area). (14)

The EA does not adequately articulate a rational connection between the characteristics of the project area and the choice to adopt site-specific, rather than forest-wide, amendments. (14)

The Forest Service admitted that overstocked stand conditions that elevate the risk of mortality or large, legacy ponderosa pine are not unique to this site (2017 EA p. 133). Thus any overstocked stand conditions cannot support a site-specific forest plan amendment. (14)

Consideration: The EA demonstrates unique characteristics of the project area. It is notably the combination of location (Developed Recreation Management Area managed to provide a safe recreational setting) and condition (the presence of a root disease that causes trees to fall unexpectedly). EA pp. 28-30, 157-160.

The acknowledged existence of LRR in other areas of the Forest does not therefore mean that it would be appropriate to amend standards and guidelines on a Forest-wide basis. Site-specific amendments are appropriate for this project because there has been no need identified and no proposals made to treat LRR or thin out large fir trees in any other Developed Recreation Management Area on the Forest.

111. **Comment:** *The obvious reason similar Forest Plan amendments are not used elsewhere is because they are unnecessary, just like they are unnecessary for this project. (14)*

Consideration: The Forest Plan amendments proposed in this project are unnecessary elsewhere on the Ochoco National Forest because the same combination of forest conditions and management allocation do not currently occur anywhere else. EA pp. 28-30. The EA describes the uniqueness of the situation, which includes the site characteristics combined with the management objectives emphasizing public safety. See EA pp. 157-160.

112. **Comments:** *Even though LRR is only 25% of the project it was the impetus to look at the entire project area. (14)*

The unprecedented use of plan amendments to treat LRR sets a concerning precedent to allow cutting of old growth in other eastern Oregon forests. (14)

Consideration: According to the best available science on managing laminated root rot in a recreational setting, in-depth surveys are done to determine the extent of trees with decayed roots posing a safety concern. Stand conditions were evaluated elsewhere to determine whether or not vegetation management and restoration was needed to promote the maintenance of healthy vegetation, and thus fewer hazards, in this popular recreation setting. Other National Forests are subject to their own Forest Plans and any future projects would be subject to the NEPA process. Managers would base their decisions on the site-specific circumstances, conditions, and Forest Plan guidance. For example, a National Forest in this region has chosen to close portions of a popular campground because other resources are present that prevent effective treatment of forest health issues that create a hazardous situation (see response to #16-25).

113. **Comment:** *The recitation of “Forest Health” MA standards and guidelines “that apply to the entire Developed Recreation MA” appears to be an attempt to distract from the Developed Recreation MA emphasis (priority) under the Forest Plan. If this emphasis did not override the Forest Service’s proposed actions, the Forest Service would see no need to use Forest Plan amendments to override Management Area goals.*

The “Forest Health” standard or guideline (4-153) also reflects the Ochoco Forest Plan being outdated and no longer based on high quality science in its direction to “use all methods to prevent or suppress insect and disease attacks,” as high quality science now recognizes the need for such natural disturbances to be allowed to function to naturally thin the forest, create snags and logs for wildlife, and create habitat niches for a variety of species, as well as for creating the variable density with skips and gaps that the Forest Service seeks to emulate with commercial thinning. Full suppression of insects and disease is no longer seen as desirable for ecological functioning, and certainly not by “all methods”.

Consideration: The EA and response to comment #19 are clear about management area direction.

Most site-specific projects and activities are designed to meet the objectives of the land management plan while reflecting current local issues and needs. In recreation areas, current science supports the Forest Plan’s direction to prevent or suppress insect and disease attacks (see previous responses #9, 16, 22, 26). In developed recreation management areas, the desired condition includes fewer structurally unstable trees and more healthy, vigorous trees that are less likely to fail to provide safe public access (Filip et al. 2014). See response to previous comment

#109 regarding NFMA's regulations allowing amendments to adapt to changing circumstances and #19 regarding the management direction.

114. **Comment:** *The Revised EA, p. 5, quotes the "Harvesting Scheduling" standard or guideline (unspecified as to which applies) as: "Harvest only for the purpose of maintaining safe and attractive recreational sites. No scheduled timber harvest." Yet the Walton Lake sale rationale includes "addressing root rot" then proposes commercial logging that resembles clearcutting and would not maintain "attractive recreation sites." Commercial logging and removal of large fir trees in sale units 1 and 5 would also greatly degrade the attractiveness of the recreational setting. (14)*

Consideration: The proposed actions in Units 2, 3, and 4 include removing dying grand fir and Douglas-fir that are highly susceptible to root and stem decays present, then planting tree species that are less susceptible to the diseases, which is the means for maintaining a safe area for the public with fewer structurally unstable trees. Project design and reforestation aid in maintaining the attractiveness. The removal of fir trees in the developed site is a thinning from below and with the project design incorporated, is expected to blend with the surroundings.

115. **Comment:** *The "Reforestation" standard or guideline (4-213) states: "Rely primarily on natural regeneration," which the root rot clearcutting and re-planting would violate. (14)*

Consideration: The standard and guideline goes on to state "planting may be done to meet management area objectives." Planting is intended to meet objectives of the Developed Recreation Management Area.

116. **Comment:** *"Harvest" standards and guidelines (4-213 and 4-215) limits "Regeneration Cuts" (i.e. clearcut openings) to 2-5 acres, which would clearly be violated with a 35 acre clearcut "Sanitation Harvest" in the root rot area. It's hardly trust-building for the Forest Service not to have revealed these Management Area restrictions in past scoping and the prior EA. (14)*

Consideration: The Forest Service described a need to amend these standards and guidelines in the August 7, 2019 scoping notice. The Forest Service undertook additional scoping and development of a revised EA in order to make sure the public had the information that was omitted from the 2017 EA. In Units 2, 3, and 4 ponderosa pine, western larch and hardwoods would be retained at varying levels throughout the stands in the proposed actions.

117. **Comment:** *The Forest Service admits in the Revised EA that: "Outside of recreation special use areas, the Walton Lake project is subject to direction in the Screens [Eastside Screens] because implementation may involve some form of timber sales." (Revised EA p. 6) The recreation special use area in this case would be the developed site portion of the Developed Recreation Management Area under special use permit by the campground concessionaire (EA p. 6), yet logging large trees and old growth forest would still be completely contrary to maintaining a "relatively natural outdoor setting" and maintaining "attractive recreational sites" as required by Management Area standards and guidelines. As the Revised EA states on p. 6, "—the Eastside Screens are still in effect for timber sale planning on the Ochoco National Forest and contain guidelines for management of timber sales." This should lead to the Forest Service meeting the Eastside Screens requirements by not logging trees equal to or over 21" dbh and by not logging Late and Old Structure (old growth) habitat, rather than using bogus Forest Plan amendments to violate the Eastside Screens and the Forest Plan. NEPA requirements for full disclosure and in depth analysis of relevant issues and conflicts is intended to prevent violations of the Forest Plan and other applicable laws, not enable them. (14)*

Consideration: The EA analyzes Alternative 4, which does not involve removing any large trees through thinning in the developed site portion of the project area or visual influence area. EA p. 18. In Units 1 and 5 in the developed site, foregoing the removal of large young grand fir and Douglas-fir within two driplines of large old ponderosa pine would mean that the density of the area around large old pine would not be reduced as much as the large young fir trees would continue to compete

with large old pine for site resources as well as providing ladder fuels. The EA states that under Alternative 4 the large old pine in Units 1 and 5 would still benefit from stand-level thinning. EA p. 42. The EA provides analysis of the key issues of large tree and LOS abundance, for which alternatives 3 and 4 were developed.

118. **Comment:** *The proposed amendments to the Eastside Screens are permanent and would have significant, long-term ramifications on forest management in the Walton Lake area. Large and old-growth trees will be gone forever, including some that are more than four feet in diameter. (14)*

Eastside Screens EA shows importance of retaining LOS and large trees. Amendments would contradict the long-term goals and objectives of the Ochoco Forest Plan because of the permanence of the actions and undercutting goals of the Screens. (14)

Even if the four proposed amendments are not individually significant under NFMA, cumulative they are. The size of the project is only one factor and must be considered in the context of the management unit and site. (14)

Consideration: None of the amendments are permanent; rather they are specific to this project. The anticipated environmental effects to LOS and large tree abundance are disclosed in the EA pp. 44-49. The cumulative effects of the Eastside Screens amendments are negligible at the watershed and Forest level. Large and old growth trees will still remain on site and will have a better chance of surviving into the future.

There is ongoing mortality in the area, including large (> 21" DBH) trees. Though the timeframe cannot be precisely estimated, the trees infested with laminated root rot are expected to fall. The most recent hazard tree assessment discovered two large trees (> 45" DBH) had died over the last year; these trees had to be felled before the site could be opened to the public. The amount of mortality is escalating; there were more hazard trees this year than previous year on record.

119. **Comment:** *Only a portion of the project area is actually set aside for recreation purposes. The Visual Influence Area is subject to different management standards and not designated for recreation; it's designated for maintaining visual quality. Visitors in the developed site do not need proposed amendments because the developed site is already exempted from the Eastside Screens. Patch size amendments would negatively impact visitors by degrading visual influence area outside developed site. There is no rationale connection between the popularity of Walton Lake and these proposed amendments. (14)*

Consideration: See Table C-2 above in response to comment #19 and response to previous comments about how the management guidance for Developed Recreation is applied. The purpose of the amendments is explained in the EA pp. 28-30.

120. **Comment:** *Changing the Visual Quality objective and Scenic Integrity level from Retention/High to Modification/Low defeats the purpose of the Forest Plan granting the Walton Lake area the protective standards and guidelines for management associated with the Developed Recreation Management Area emphasis, standards and guidelines. (14)*

Ten years (actually much longer) of change from retention of visual quality and high scenic integrity to (heavy) "modification" of visual quality and low scenic integrity for 35 acres in a small popular recreation area is a significant negative effect to the recreational appeal and scenic integrity of the Walton Lake area. (14)

It will take 200 years for the visual quality of the clearcut areas to recover in any meaningful sense. (14)

The amendment would allow for this project at least 35 acres of clearcutting, and perhaps more acreage for future projects. No time-limit restriction is given for this amendment as with the scenic views amendment. (14)

Consideration: The amendments for this project are narrowly constructed to be applicable to specific acres for specific purposes, and they allow the Forest Plan to adapt to the new information and changing conditions at the project site. The alternatives that include amendments to the scenery standard will meet the overall emphasis of the management area, and we expect that within about 10 years the forested character of units 2, 3, and 4 will appear intact.

In Units 2, 3, and 4 ponderosa pine, western larch and hardwoods would be retained at varying levels throughout the stands in the proposed actions. An amendment to the patch size limit is specific only to implementation of the Walton Lake Restoration Project and the 35 acres identified for sanitation harvest (EA p. 30), and a decision to authorize Alternative 3 would include an amendment to the patch size limit specific only to implementation of the Walton Lake Restoration Project and 14 acres of sanitation harvest (EA p. 16).

121. **Comment:** *The Forest Plan amendments are significant and require additional procedures under NFMA and must be supported by a full EIS. (14)*

The amendments alter long-term goals and objectives of the plan. (14)

The current analysis does not address their significance under NFMA or the Handbook factors. (14)

Consideration: The amendments are proposed under the 2012 Planning Rule and the appropriate NEPA documentation for an amendment may be an EIS, an EA, or a categorical exclusion, depending on the scope and scale of the amendment and its likely effects. 36 CFR 219.13(b)(3). Forest Service Handbook 1909.12 Chapter 20, sec. 21.3 provides guidance on amending Forest Plans under the 2012 Planning Rule. This project was appropriately analyzed in an EA because the scope and scale of potential effects were not expected to be significant. Had the analysis revealed significant effects, an EIS would have been initiated.

122. **Comment:** *The EA says the plan amendment is justified because “Forest health experts recommend that sanitation harvest and planting with more resistant species is a more effective approach.” Forest health experts are just one source of information to inform a sound decision. Each expert is trained to see problems and solutions through a selective lens that does NOT consider all the alternative viewpoints. Forest health experts may not be trained to consider and balance the needs of wildlife, recreation, carbon storage, etc. The FS should choose an alternative that does not amend the forest plan and does not retain large trees. (17)*

Consideration: The Forest Service also considered public comment and developed Alternative 4, which does not involve any Forest Plan amendments. That alternative is based on the viewpoint that it would be better for the forest and the recreating public to not address forest health issues. This viewpoint is also addressed with the No Action alternative. The Responsible Official considers the input from resource specialists and the public when determining how to balance the trade-offs associated with the alternatives and which alternative to select.

123. **Comment:** *The EA does not give proper consideration to the applicable 2012 Planning Rule factors. (14)*

As the EA admits in Appendix B, the proposed logging in units 2-4 would be a “regeneration harvest,” also known as clearcutting. The EA should give proper consideration to the 2012 Planning Rule factors that address impacts to aesthetic and visual resources in the visual influence area. (14)

Consideration: It is correct to say that a clearcut is a type of regeneration harvest. However, the silvicultural treatment proposed in Units 2-4 is not to clearcut. In these Units ponderosa pine, western larch and hardwoods would be retained at varying levels throughout the stands in the proposed actions. EA p. 20, 36. The planning rule factors are addressed on pages 158-159, and Appendix B.

124. **Comment:** *The project would not “preserve the diversity of tree species similar to that existing in the region controlled by the plan.” Because it removes the majority of fir trees around the south side of the lake and reduces diversity of trees in the recreation area. (14)*

Consideration: This substantive requirement of the planning rule does not directly apply to the need for change of the site specific conditions in the Walton Lake project area. The project area is too small to be relevant to maintaining diversity of native trees species in the plan area (less than 180 acres total, which is about 0.02% of the Forest). Nevertheless, the diversity of tree species in the project area around Walton Lake will not change. Though Units 2, 3, and 4 call for removal of all grand fir and Douglas-fir within the 35-acre unit, there are retention areas where fir trees will be retained; and thinning units 1, 5, 6, 7, and 8 do not call for removal of all fir trees.

125. **Comment:** *Because the majority of the proposed logging around Walton Lake would occur in the designated Visual Influence Area, the factors related to visual resource should be given particular attention. The EA gives cursory consideration and draws arbitrary conclusions re: “aesthetic values, recreation settings, scenery, and viewsheds. (14)*

Consideration: The EA addresses the substantive requirement related to aesthetic values. See EA pp. 157, 185. The EA identified scenic integrity as a key issue and developed alternatives to address it. Expected effects to scenery integrity are disclosed on pp. 70-73 and expected effects to the recreation experience are disclosed on pp. 60-63.

COMMENTS STATING AN ALTERNATIVE PREFERENCE

Given the current comment period on the proposed management actions, based upon credible ecological science and site-specific first-hand knowledge, my recommendation is the No Action alternative, modified to end the public closure on the root rot areas, and to re-mark the cancelled timber sale that is already marked to cut within the closure and in other sale units by blacking out all markings for cut or leave trees and removing all flagging and unit boundary signs. Retention of the warning signs around the root rot areas are a reasonable part of the No Action alternative that could be used. (1)

The Walton Lake developed recreation area is identified as critical infrastructure within the Wildland Urban Interface in the Crook County Community Wildfire Protection Plan due to public safety concerns related to the significant number of visitors to the area, particularly throughout the summer and fall when burning conditions are at their most severe. The Walton Lake Campground and Day Use Area were evacuated in the summer of 2014 due to public safety concerns related to multiple wildfires in the vicinity. Implementing the No Action Alternative, or any of the three alternatives above, is not viable due to these critical safety concerns in the Walton Lake Project area. (2)

AFRC fully supports Alternative 2 the Proposed Action. This alternative best meets the Purpose & Need and is the most cost effective use of the public's money for the public's benefit. Alternatives 3 and 4 would provide some benefit but do not adequately meet the safety need. Signing and closures in the heavily infected laminated root rot areas do not protect the public that recreates in these areas. Signing most likely does not remove the Forest Service's liability, especially since the Agency is well aware of the existing safety issues. Further, the trees infected with laminated root rot will continue to decay and fall over and create increased fuel loads with the associated hazards. (2)

The No Action alternative is the only choice here it must include a modification to end the public closure on root rot areas but retain warning signs. Please also block out the markings and remove the flagging. (13)

Contrary to the Forest Service assertion to the contrary on Revised EA p. 59, alternatives 3 and 4, while not our choice, would actually meet Management Area objectives better for a Developed Recreation area than the proposed action. The No Action alternative would meet those Management Area objectives better

still, based on retaining the primary emphasis on a natural outdoor setting, which is what recreationists seek in coming to Walton Lake. (14)

With the identification of Laminated Root Rot in 2014/15 within the designated recreation area around Walton Lake, the Forest Service implemented an interim access restriction to protect public safety. This restricted access still puts the public at risk. Recreation is an important part of the Crook County's economy and fixing this problem is imperative to the reduction in risk of human loss of life or severe injury. Crook County is supportive of the corrective actions outlined in Alternative 2 of the EA. (19)

As summarized on page 4 of the EA, the Developed Recreation Management Area boundary is to emphasize management which: Provides safe, healthful, and aesthetic facilities for people to utilize while they are pursuing a variety of recreational experiences within a relatively natural outdoor setting. Alternative 2 is the only alternative which complies with this objective. All other alternatives analyzed provide an incomplete fix and would fail to provide for the safety and well-being of the public. (19).

Consideration: The Forest Service considered these comments but no response is necessary.